Our ref: LDP-250-5

15 November 2016

Dear Mr Walker

PROPOSED FIFE LOCAL DEVELOPMENT PLAN
THE TOWN AND COUNTRY PLANNING (DEVELOPMENT PLANNING) (SCOTLAND) REGULATIONS 2008

SUBMISSION OF THE REPORT OF THE EXAMINATION

We refer to our appointment by the Scottish Ministers to conduct the examination of the above plan. Having satisfied ourselves that the council’s consultation and engagement exercises conformed with their participation statement, our examination of the plan commenced on 29 September 2015. We have completed the examination, and now submit our report.

In our examination, we considered all 38 issues arising from unresolved representations which were identified by the council. In each case, we have taken account of the original representations, as well as the council’s summaries of the representations and the council’s responses. We have set out our conclusions and recommendations in relation to each issue in our report. The examination process included a comprehensive series of unaccompanied site inspections and, for many issues we requested additional information from the council and other parties. A hearing session was held on 9 February 2016. This dealt with matters relating to Issue 2b (Homes).

The council has also submitted an updated version of the proposed plan and proposals map with various pre-examination edits. These are described by the council as topographical errors and non-notifiable edits. The reporters have not, therefore, considered them in this report.

Subject to the limited exceptions as set out in Section 19 of the Town and Country Planning (Scotland) Act 1997 (as amended) and in the Town and Country Planning (Grounds for Declining to Follow Recommendations) (Scotland) Regulations 2009, the council is now required to make the modifications to the plan as set out in our recommendations. The council should also make any consequential modifications to the text or maps which arise from these modifications. Separately, the council will require to make any necessary adjustments to the final environmental report and to the report on the appropriate assessment of the plan.
A letter will be issued to all those who submitted representations to inform them that the examination has been completed and that the report has been submitted to the council. It will advise them that the report is now available to view on the DPEA website at:

http://www.dpea.scotland.gov.uk/CaseDetails.aspx?id=116917

The documents relating to the examination should be retained on the council's website for a period of six weeks following the adoption of the plan. It would also be helpful to know when the plan has been adopted and we would appreciate being sent confirmation of this in due course.

Yours sincerely

Katrina Rice     Richard G Dent      Robert W Maslin     E D K Thomas
REPORTER        REPORTER           REPORTER            REPORTER

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REPORT TO FIFE COUNCIL

PROPOSED FIFE LOCAL DEVELOPMENT PLAN EXAMINATION

Reporters:
Katrina Rice BSc (Hons) DipTP MRTPi
Richard G Dent BA (Hons) DipTP
Robert W Maslin BA DipTP MRTPi
Dilwyn Thomas BSc (Hons) MBA MRTPi

Date of Report: 15 November 2016
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Examination of conformity with the participation statement

Introduction

1. Section 19(4) of the Town and Country Planning (Scotland) Act 1997 (as amended) states that the person appointed to examine a proposed local development plan “is firstly to examine under this subsection the extent to which the planning authority’s actings with regard to consultation and the involvement of the public at large as respects the proposed plan have conformed with (or have been beyond the requirements of) the participation statement of the authority which was current when the proposed plan was published under section 18(1)(a).”

Participation statement

2. The “participation statement” included in the Fife Development Plan Scheme (December 2013) sets out the council’s proposals for public involvement in the preparation of the FIFEplan. The methods used by the council were based on the minimum requirements for consultation and engagement set out in legislation and the principles set out by Scottish Government in PAN3/2010 Community Engagement.

3. The participation statement set out ways to participate and the consultation methods which would be used. A table describes the methods of publicity and engagement to be undertaken at each of the 8 stages of plan preparation. This provides an indication of the consultation proposals and time scales for the Fife local development plan.

Report of conformity with the participation statement

4. The council’s report of conformity with the participation statement was submitted with the proposed local development plan, in accordance with section 18(4)(a)(i) of the Act. The introduction states that the council has gone beyond the requirements of the participation statement, engaging the community and promoting public participation in the preparation of FIFEplan. Annex A outlines the main processes involved and the agencies and groups consulted for each stage of the plan preparation process. The report provides a summary of the participation methods used by the council to fulfil the aims of the participation statement. The following are examples of where the council went beyond the minimum consultation requirements:

- An additional participation stage before preparing the Main Issues Report called “Community Matters”
- An additional opportunity to comment on the “Development Strategy” before the proposed plan was finalised
- A 12 week consultation period for community matters (2012), 8 weeks for the Main Issues Report (2013), 8.5 weeks for the Development Strategy (2013/2014) and 6 weeks for the proposed plan (2014). The minimum statutory requirement is 6 weeks
- Neighbour notification was carried out within 30 metres rather than the minimum 20 metres
5. The council also sought to raise awareness of the consultation process in the following ways:

- Copies of the proposed plan and maps were sent out to Community Councils for their area and were available at 57 local libraries
- Site assessments were published and updated alongside the Main Issues Report, Development Strategy and proposed plan
- Press releases
- A webpage, twitter account and LinkedIn group
- E-mail bulletins on a monthly basis
- Drop-in events
- Charrettes
- Local member briefings

6. The council’s response to representations about the consultation process are included as an Annex to the report. Following further information requests, the council provided more information with regard to the Fife Local Development Plan Exchange at the Community Matters stage, the use of public information displays at the Main Issue Report stage and how those who were not computer literate were involved in the consultation process. A list of the 57 local libraries, where hard copies of relevant consultation documents were available to view, was also provided.

The reporter’s conclusions

7. A number of representations to the proposed plan refer to a lack of engagement on the part of the council (see Issue 1 – General Comments). However, the council’s report of conformity with the participation statement clearly shows that it has achieved what it set out to do in its participation statement and has complied with the legal requirements. Having considered all of the information provided, including in the further information requests, we find that the council has conformed with its participation statement and has in many cases exceeded minimum consultation requirements with regard to consultation and the involvement of the public at large as envisaged by Scottish Ministers.

8. We are satisfied that it is not necessary to submit a report to Ministers under section 19A(1)(b) of the Act. The examination of the proposed plan can therefore proceed.

Katrina Rice
Reporter

29 September 2015
# Issue 1

## General Comments

### Development plan reference:

General Comments on the Plan

### Reporters:

Robert Maslin
Katrina Rice

### Body or person(s) submitting a representation raising the issue (including reference number):

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General Comments

Planning authority’s summary of the representation(s):

Sportscotland (46): Any potential loss of an outdoor sports facility should be assessed in accordance with the provisions of paragraph 226 of Scottish Planning Policy and appropriate compensatory provision sought where this accords with Scottish Planning Policy. Sportscotland support the Proposed Plan comments regarding the need for replacement facilities at sites KDY 040; LVA 003 and LGY 012. Where land allocations promote the redevelopment of former educational establishments which accommodate outdoor sports facilities; it would be helpful if a note could be provided in the site description about plans for said facilities, e.g. whether pitches left on site are to be retained for community use.

SEStran (709): The Proposed Plan is a major step forward in development planning for the Fife area and individual comments are raised in the relevant sections of the Plan.
Scottish Natural Heritage (895): The approach taken to preparation of the Local Development Plan to engage collaboratively in plan preparation rather than only at the point of consultation is welcomed. This approach has allowed us to focus our response on only a few areas in which we believe some clarifications and minor modifications are required. Overall, the proposed plan is clearly written, easy to navigate and supported by well-chosen, clear illustrations and graphics. In general, we welcome the context that the plan provides for the natural heritage as an asset which underpins Fife’s urban and rural areas. We particularly welcome the integration of green network priorities into settlement plans and the interactive mapping of proposals. This represents the most clearly defined approach to setting out requirements for green networks that we have seen to date.

Alfred Stewart Property Foundation Ltd (1950): Lack of settlement statements for any settlement in Fife. No evidence of Council expectation for a settlement’s aims or strategy.

David McLean (358); Gordon Hill (768); D Callander (764); John Jerkins (772); Elizabeth McKay (745); Ross McKay (748); Lindsay McKay (751); Patricia Brown (754); T Hamilton (760); J M Watson (777); Alison & Steven Rodger (785); J Atherton (1082); Mary Baird (1088); Arthur Baird (1005); Graham A Black (1018); Ian Pollock (1038); Stuart Steven (1094); Sylvia Greig (1098); Thomas Greig (1101); Tracey Coll (1104); Gordon Horn (1107); J W Williamson (1110); Ken & Grace Nicol (1114); Sheila Robinson (1117); Thomas P Graham (1121); Duncan Mitchelson (2345); John Gunn (2450); Lynne Ferguson (2486); A Guile (2438); T Guile (2443); Lorraine Guile (2447); Stacy Gunn (2454); Barbara Thomson (2457); T Inglis (2461); Alison Inglis (2465); Margaret Thomson (2473); Margaret Watson (2482); Joanne Crumey (2489); Sandra McKenzie (2501); Alex MacKenzie (2506); Tom Gibson (2511); Susan Wallace (2538); J Fyfe (2542); Christine Wallace (2547); Archie Ferguson (2551); R Ferguson (2554); David Kerr (2559); Ann Kerr (2563); Joan Davison (2568); Ella Coates (2958); Barbara Waller (2836); David Adamson (2839); Carol Adamson (2844); T P Walker (2848); Pamela Wilson (2855); Irene Wilson (2863); Andrew Scott Wilson (2869); Michael James Chadfield (2875); Shiela Ann Chadfield (2883); Nancy Ray (2891); Mark Sherry (2903); Lorraine Harvey (2909); Kvetka Jiraskova (2914); S Lawrence (2920); Janis Lawrence (2955); Carolyn Kinnear (2961); Patricia Brearey (2966); David Brearey (2971); Isobella Saunders (2976); Terry Tully (2980); Mary Tully (3007); James Forbes (3010); Mark Monaghan (3031); James Spalding (3039); David McLean (3061); Ann Forbes (2988); Matthew Forbes (2994); Janet MacPherson (3002); Kevin Cummings (3013); Steve McLean (3028); Sharon Monaghan (3034); Elaine Spalding (3042); E McLean (3052); Sheila Malpas (3068); Lisa Malpas (3078); Mary Simpson (3093); David Stubbs (3192); Steven Bowman (3107); Sharon Easton (3112); Jean Tait (3121); Rachel Thomson (3129); James Leggate (3196); Mary O’Dell (3200); Michael J Emms (3221); A & L Duff (3229); J Whyte (3233); Lorna Clark (3179); Pamela Paxton (3184); Aileen Emms (3187); Kevin Searle (3240); Christine Hyde (3261); Barbara Inglis (3270); Calum Dewar (3286); Catherine Brownlee-Noble (3427); Elizabeth Bailey (3431); Gail Hogg (3435); Irene Marshall (3461); Janet Brown (3469); Lee Maclean-Marshall (3505); Norman Ainslie (3525); J Nicol (3531); Jane Ainsley (3536); Neil Frame-Noble (3571); Robert Lowes Noble (3597); Steven Inglis (3601); Stuart Nicol (3605); V Richardson (3609); John Lowe (3613); Donna Kirk (1916); Kirsteen Shaw (830); S Egner (2335): Object to the process, Fife Council has failed to carry out a democratic process; the Council did not provide enough warning of the consultation, advice with commenting or time to comment.
Lisa Waugh (123): Inadequate notification of process, Council website too difficult to find information on proposals.

Lisa Waugh (124): The interactive map system doesn’t work.

Stephen McDonald (362): The numbering of sites has changed through the process which has led to confusion, lack of transparency and conflicting information.

Agnes Adams (3909): The areas identified in the plan have changed since Dec 2013, this is misleading. For example the numbering of sites KEN002 and KEN003 has changed round.

Moray Glennie (862): The process undertaken has two fundamental flaws:

1. Profit driven developers are allowed to nominate sites for inclusion in the plan; this encourages them to submit the easiest sites. The process should be encourage the development of Brownfield sites;

2. The process appears to favour the developer/landowner. A site can be refused in one plan and then be proposed again in the next, site promoters may even put in planning applications. This makes a mockery of local democracy.

Susan Ramsay (72): Publicity for the consultation was inadequate. The consultation process has been very rushed. Development adverts were poorly headed to confuse the reader. Need a planning expert to notice and translate. Request a newsletter to all households. Very hidden process.

Dr Lucinda Winward (981): Fife Council has failed to carry out a democratic process; there was not enough time to comment. There is confusion over the number of plans that have been produced, the relationship between Structure Plans and Local Plans and the various consultations that have taken place. The whole process should be rethought and represented in clear unambiguous terms. Needs better advertising to all residents.

Graeme Whyte (3619): one public engagement meeting (Dunfermline) during working hours was inadequate.

James Bell (3861): The emphasis towards on-line “democratic” consultation is not democratic. Many people cannot use the internet. The altering of site reference numbers makes for confusion, incomprehension and hostility towards the planners. Suggest free local newspapers should be made use of. (screen shots supplied). Amendments to the process are not effectively communicated.

P M Uprichard (2776): Objects to one plan for whole of Fife, this creates a massive document that is incomprehensible to the ordinary public. The six week consultation period is too short for a plan of this scale. Questions if the councillors who approved the plan for consultation had managed to read it as the CD of information had only been circulated a few days before. Suspects the Examination Reporters will be reluctant to change anything as the plan represents the settled will of the Council. Believes the content of the plan has already been decided.

J Watchman (2519): FIFEplan should use the approach taken by Scottish Planning Policy and highlight where a glossary definition is used in main text.
J Watchman (2523): The following comments are made on the glossary definitions:

Brownfield Land: the definition is inconsistent with the Scottish Planning Policy definition;

Development: insert a full stop after ‘1997’ then delete remaining text;

Development Brief: delete “by the Council”, as a brief can be prepared by others;

Effective housing supply: should read Effective housing Land supply;

Environmental Impact Assessment: the definition should reference the regulations including Town & Country Planning (Environmental Impact Assessment (Scotland) Regs 2011 (SSI 2011 No 139);

Established housing land supply: the definition is inconsistent with glossary definition in PAN 2/2010;

General Needs Housing and Special Needs Housing: review these two definitions to ensure they are consistent for instance the approach towards housing for students;

Greenfield site: clarify the term “urban use”;

Green Transport Plan: why is the objective restricted to reducing car travel for business purposes only? What are business purposes?

Housing demand: the definition is inconsistent with glossary definition in PAN 2/2010;

Housing Land Requirement: the definition is inconsistent with glossary definition in PAN 2/2010;

Housing need: the definition is inconsistent with glossary definition in PAN 2/2010;

Planning customer guideline: add “not Supplementary Guidance” at the end;

Supplementary Guidance: amend the definition to indicate that this is guidance under section 22 of the Town and Country Planning (Scotland) Act 1997 which is subject to consultation and is approved by the Council;

Windfall site: inconsistent with glossary definition in SPP.

The Thousand Huts Campaign (95 & 96): Provide information on the benefits of huts as a benign form of development.

West Fife Villages Community Council Forum (2800) & West Fife Villages Community Project Group (2812): Object to Plan as a consultation document. No community engagement as per local or national requirements. Clashed with Community Council elections therefore very difficult for councils to co-ordinate responses. No equal opportunities promoted or encouraged. Page 249 makes a reference to non-specialist readers which implies the Plan in its current format is not intended for the public. This therefore contradicts the whole process. The document presumes a prior knowledge of the Planning process in terminology etc. This document excludes the very people it is meant for. Not written in clear English. Quotes use of “material consideration” and “LDP” as unexplained. One drop-in for all West Fife is inadequate. This was not a chance to
contribute to a plan but to be explained what was going to happen. A series of workshops with Planning Aid to help communities understand what FIFEplan is would have been good.

Kevin O’Kane (1937): Fife Council’s Greenspace Officer, is concerned that certain important areas of protected open space are not properly mapped, and cites two examples in Dunfermline (at Robertson Road Playing Fields and in the Lyneburn corridor). It is contended that this is contrary to Scottish Planning Policy.

Scottish Environment Protection Agency (3301): There is scope for the accompanying Action Programme to be amended to more clearly set out the key actions to be taken by Fife Council and other responsible person(s)/stakeholders required to deliver the Local Development Plan policies and proposals. This will may allow for more effective implementation of the plan and allow for a valuable link between the Action Programme and the Plan. Suggestions included in the response include more regular reviews (such as quarterly or 6 monthly reviews and that the Lead Agency section is widened out to record Lead Agencies and other participants.

Alfred Stewart Property Foundation Ltd (1947): Comment highlights the following: two employment sites (BUR009, BUR010) include capacities for housing; the capacity of housing opportunity proposal KDY006 has increased for 5 units to 119; Proposal COW009 is identified for housing and employment but no capacity for housing numbers is given, in addition one hectare of the site is identified as for employment uses but the site area is given as 0.8 hectares; and housing proposal LPH002 has no capacity identified.

These sites should be removed if basic development details cannot be provided.

### Modifications sought by those submitting representations:

| Alfred Stewart Property Foundation Ltd (1950): Provide statements setting out strategies for the settlements in Fife. |
| J Watchman (2519): FIFEplan should highlight where a glossary definition is used in main text. |
| J Watchman (2523): The following changes should be made to the glossary definitions: |
| Brownfield Land: Make the definition consistent with the Scottish Planning Policy definition; |
| Development: insert a full stop after ‘1997’ then delete remaining text; |
| Development Brief: delete “by the Council”, as a brief can be prepared by others; |
| Effective housing supply: should read Effective housing Land supply; |
| Environmental Impact Assessment: the definition should reference the regulations including Town & Country Planning (Environmental Impact Assessment (Scotland) Regs 2011 (SSI 2011 No 139); |
Established housing land supply: Make the definition consistent with glossary definition in PAN 2/2010;

General Needs Housing and Special Needs Housing: ensure these definitions are consistent;

Greenfield site: clarify the term “urban use”;

Green Transport Plan: clarify why this is restricted to reducing car travel for business purposes only;

Housing demand: Make the definition consistent with glossary definition in PAN 2/2010;

Housing Land Requirement: Make the definition consistent with glossary definition in PAN 2/2010;

Housing need: Make the definition consistent with the glossary definition in PAN 2/2010;

Planning customer guideline: add "not Supplementary Guidance" at the end;

Supplementary Guidance: amend the definition to indicate that this is guidance under section 22 of the Town and Country Planning (Scotland) Act 1997 which is subject to consultation and is approved by the Council;

Windfall site: Make the definition consistent with the glossary definition in Scottish Planning Policy.

West Fife Villages Community Council Forum (2800) & West Fife Villages Community Project Group (2812): provide definitions of ‘material consideration’ and ‘LDP’ in the glossary

Kevin O’Kane (1937): Identify and protect open space identified in the open space audit and strategy in FIFEplan.

Alfred Stewart Property Foundation Ltd (1947): Delete proposals BUR009, BUR010, KDY006, COW009 and LPH002 if basic development details cannot be provided.

**Summary of responses (including reasons) by planning authority:**

Sportscotland (46) Where educational establishments are being redeveloped, outdoor sports facilities will not retained on site if this requirement is not stated within the “status, additional development requirements, and other information” section of the proposal in FIFEplan. However, where an educational establishment is being replaced on the existing or new site, replacement provision will be provided as part of the new development.

SEStran (709) Comments are noted.

Scottish Natural Heritage (895) Comments are noted.

David McLean (358); Gordon Hill (768); D Callander (764); John Jerkins (772); Elizabeth
The consultation process

Issues regarding the consultation that have been raised through many of the representations are addressed by the Statement of Conformity with the Participation Statement.

There have been opportunities earlier in the preparation of the plan (prior to the publication of the proposed plan) for people to make comments to help shape the content of the plan (the Main Issues Report and Development Strategy consultation stages). The proposed FIFE plan presents Fife Council’s settled view of the plan based on the comments received through these earlier rounds of consultation. The consultation on the proposed plan gave people the opportunity to highlight outstanding issues to be addressed through the Examination process. The 8 drop in events held as part of the consultation on the proposed plan were an opportunity for people to meet with the Planning Officers to discuss the process and the content of the plan.

The Local Development Plan Process undertaken

Fife Council has followed the process set out by Scottish Government in Planning
Circular 6/2013: Development Planning (see Supporting Document SD1 pages14-26). This document clearly sets out what is expected of the Council at the different stages in the development of the Plan. The circular refers to the ‘Call for Sites’ process (see SD 1 page 15, paragraph 64) as one which many authorities run prior to preparing the Main Issues Report. This is a well-established process within the preparation of Local Development Plans and it is common place for councils to use this method to identify new sites for inclusion in the plan.

In addition to the call for sites process, which tends to receive submissions from the landowner and development interests, at the start of the LDP process there was an open call to community groups and organisations to submit ideas for their communities. This stage was called Community Matters and helped us identify what matters were important to local communities and reflect these in the Main Issues Report. A number of submissions were made and shared on the FIFEplan web pages. These included:

- Dalgety Bay Town Centre Framework
- Inverkeithing Community Development Vision
- Saline & Steelend Community Futures: Community Views Survey Report
- Boarhill and Dunino Community Council – Community Matters
- Crombie Community Council – Community Matters
- Kingsbarns Community Council – Community Matters
- Largo Area Community Council – Community Matters
- Newburgh Community Council - Community Matters

Through the Main Issues Report (see CD12, question 40, page 81), the focus of seeking the views of communities and gathering information and evidence to gain a better understanding about issues and opportunities in communities continued. Communities had the opportunity to submit any issues to be addressed for their settlement. This included identifying any potential development sites and areas that should be protected from development.

As Moray Glennie (862) comments, a planning application can be made at any time, for any site. That is the statutory planning process that Fife Council works within. Local communities and individuals have the opportunity to comment on planning applications as a central element of the planning process.

Stephen McDonald (362), Agnes Adams (3909), James Bell (3861) Fife Council appreciates that the numbering used for the candidate sites and the proposals in FIFEplan could lead to confusion and an apparent lack of transparency. The Council is investigating alternative ways of allowing sites to be monitored as they move through the Fife Local Development Plan process that will be used in the development of future plans.

**Scale of FIFEplan**

PM Uprichard (2776) The decision to have a single Local Development Plan covering the whole of Fife was approved at Fife Council Planning Committee on 19th October 2010. The reasons behind this approach were set out in the report that went before committee:

‘Fife is split between two strategic development plan authority areas. With the approval
and implementation of the SDPs, the Fife Structure Plan 2006-26 will fall and there will be no statutory framework to bring forward a replacement Fife Structure Plan or other Fife-wide plan other than the LDP. A single LDP for Fife will therefore provide a clear and strong Fife wide strategy which draws together the two visions from SESplan and TAYplan, in a single document…. At the same time a single LDP provides the opportunity for local issues to be addressed at a local level through settlement statements and plans brought forward through the LDP and for detailed policies and minor proposals to be developed as supplementary guidance.’

The point was also made that a single Local Development Plan would provide a consistent set of core policies that would apply across Fife rather than the slight variations that have occurred following the examinations of the three existing adopted Local Plans. See SD2 Fife Council Planning Committee report Fife Local Development Plan 19th October 2010 pages 7-8)

FIFEplan online

The size and complexity of the Local Development Plan documents is a consequence of added regulation in the development planning process and the need for transparency in making supporting information available. The approach to consultation on the Local Development Plan has been consistent with the e-planning agenda and the national initiative. Hard copy/printed documents are available in libraries throughout Fife and are available for purchase at a price commensurate with production costs. All information related to the Local Development Plan is freely available via the web.

Lisa Waugh (123 & 124) During the consultation, a total of 6,869 online sessions through the Council’s FIFEplan mini-site were recorded (a session is a period of time a user is actively engaged on the website) with 4,076 unique users having at least 1 session. This illustrates a high level of online usage. An online user guide was also available to guide people through the system. This was available in hard copy at the information events/drop-in sessions, emailed out on request and was available to download from the FIFEplan web site. Whilst there were very few comments received indicating that the online version of the Local Development Plan was difficult to understand, Fife Council aims for continuous improvement and any comments regarding lack of clarity will be examined with a view to learning lessons that will help to make future Local Development Plans even more user-friendly.

The online sessions referred to above generated 112,917 public online mapping interaction requests (a request can be each site search or each pan and zoom of a map). This shows that within the 6,869 online sessions, users were engaged in the process and interrogated the interactive mapping. Whilst one representation suggested the interactive mapping system didn’t work, the usage statistics illustrate that the system was been well used. No server down-time was recorded which suggests that the system was available 24 hours a day, 7 days a week within the consultation period.

Settlement plan summaries

Alfred Stewart Property Foundation Ltd (1950) It is considered that the principles that are set out in the spatial strategy apply to all settlements across Fife, therefore there is no need to repeat these principles for each settlement. Further details are also contained in the 9 area strategy sections. Where it was considered that additional detail was required, such as for the town centres and the Strategic Development Areas, this has
been provided either in the settlement plans or in associated policies.

**Glossary**

J Watchman (2519, 2523) There are a wide range of different audiences that will use FIFEplan for different purposes; these include people who understand and people who do not understand planning terminology. Whilst a technical document, the plan is written to be as clear as possible, however there are always terms that have common usage within a discipline (and are therefore useful to use) but which need further explanation for non-specialist readers. This is the reason that a glossary is provided. J Watchman (2519) suggests that the online plan should highlight text where a glossary definition is provided as has been done for Scottish Planning Policy online. This is something that Fife Council will investigate when the adopted plan is presented online.

The reference to the Planning etc (Scotland) Act 2006 should remain in the definition of Development as this makes changes to the legal definition in the Town and Country Planning (Scotland) Act 1997.

The definition used for Greenfield site is taken from PAN 2/2010 (see CD 10 page 21). The term ‘urban use’ is not specifically defined by Scottish Government but would refer to land within settlements which has been developed and/or land which does not have an agricultural or formal/informal greenspace or landscape use. Given the looseness of this term it is not considered appropriate to try and define it more specifically in the glossary.

A Green Transport Plan (or Travel Plan) is defined by Scottish Government as: ‘..a general term for a package of measures tailored to the needs of individual sites and aimed at promoting more sustainable travel choices and reducing reliance on the car. Travel Plans help reduce the impact of travel on the environment; they can encourage greater levels of physical activity; and they also make good business sense. They can cut congestion around a location, improve neighbourhood relations and save money on business travel.’ (see SD3 Scottish Government Travel Plan 2007 page 1)

Green Transport Plans therefore do not only apply to business uses so it would be appropriate to amend the definition to reflect this.

Fife Council considers there is merit in making the following changes to the glossary definitions (in response to comments by J Watchman (2523):

In line with Scottish Planning Policy (see CD1 pages 71 – 75):

**Brownfield land** – Amend the first part of the definition to read ‘Land which has previously been developed. The term may cover vacant or derelict land; land occupied by redundant or unused building and developed land within the settlement boundary where further intensification of use is considered acceptable.’

Fife Council still considers that it is useful to include the last sentence of the FIFEplan definition that sets out what is not considered as brownfield land.

**Windfall sites** – Amend the definition to read ‘Sites which become available for development unexpectedly during the life of the development plan and so are not identified individually in the plan.’
In line with PAN 2/2010 (see CD10 page 21):

Effective housing supply – amend to ‘Effective Housing Land Supply’ and amend the definition to read ‘The part of the established housing land supply which is free or expected to be free of development constraints in the period under consideration, and will therefore be available for the construction of housing.’

Established housing land supply – Amend the definition to read ‘The total housing land supply - including both unconstrained and constrained sites. This will include the effective housing land supply, plus the remaining capacity for sites under construction, sites with planning consent, sites in adopted local development plans and where appropriate other buildings and land with agreed potential for housing development.’

Housing demand – Amend the definition to read ‘The quantity and type/quality of housing which households wish to buy or rent and are able to afford.’

Fife Council still considers that it is useful to include the last sentence of the FIFEplan definition that describes how the housing demand is assessed.

Housing land requirement – Amend the definition to read ‘The amount of land required to be allocated for housing to meet the identified housing requirement.’

In addition add in the definition for Housing Requirement which reads ‘The total amount and type of housing necessary to accommodate a given or projected population at appropriate minimum standards. This includes both housing need and demand’ to provide a more comprehensive explanation.

Housing need – Amend the definition to read ‘Refers to households lacking their own housing or living in housing which is inadequate or unsuitable, who are unlikely to be able to meet their needs in the housing market without some assistance.’

Special Needs Housing – Include a reference to non-permanent accommodation (e.g. for students) as set out in Scottish Government guidance on specialist provision in the HNDA Practitioners Guide (2014) (see SD4 HNDA Practitioners Guide (2014) page 36). Amend the text to read ‘housing specifically intended for use by particular groups or non-permanent accommodation (e.g. older people with additional needs, those with disabilities, people with learning difficulties, students etc.)

Other changes considered to have merit:

Development brief – these can be prepared by others therefore the reference to 'by the Council' should be deleted.

Environmental Impact Assessment – Amend the definition to refer to the ‘Environmental Impact Assessment (Scotland) Regulations 2011 (Circular 3 2011)’ rather than the 1999 regulations.

Green Transport Plans - amend to ‘Green Transport Plans (also called Travel Plans)’ and amend the definition to read ‘A plan or strategy that aims to promote more sustainable travel choices and reducing reliance on the car. It seeks to enhance opportunities for users, employees or visitors to travel by walking to travel by walking, cycling or public transport.’
A second entry ‘Travel Plans’ could be included with the same definition.

Planning Customer Guideline – the definition should make clear that these are not the same as Supplementary Guidance.

Add the following text to the end of the definition: ‘They are not formally approved by Fife Council at committee and therefore do not carry the same weight in the planning process as Supplementary Guidance.’

Supplementary guidance – add the following text to the definition ‘

‘Supplementary Guidance is prepared in line with Section 22 of the Planning etc. (Scotland) Act 2006 and regulation 27 of The Town and Country Planning (Development Planning) (Scotland) Regulations 2008 and forms part of the Local Development Plan. Supplementary Guidance is subject to public consultation and is approved by the Council and formally submitted to Scottish Ministers.’

Add the following new terms and definitions to the glossary (as suggested by West Fife Villages Community Council Forum (2800) & West Fife Villages Community Project Group (2812)):

LDP: Local Development Plan

Material Considerations: matters that will be taken into account when deciding whether or not a planning application will be approved.

Huts

The Thousand Huts Campaign (95 & 96) While the benefits of huts as a benign form of development are not specifically highlighted in the plan, the policy approach allows flexibility for development that requires a countryside location and can be justified against the criteria contained in policy 7: Development in the Countryside.

Equal opportunities

West Fife Villages Community Council Forum (2800) & West Fife Villages Community Project Group (2812) Under the public sector equality duty of the Equality Act 2010, Fife Council has a legal obligation to assess the equality impact on equality groups of changing policy or practice, the result of this assessment for FIFEplan is as follows:

The focus of the Local Development Plan is on new proposals and changes from the existing Local Plans. In addition, it provides for stability in areas where no significant change is proposed. The Plan policies and proposals are applied regardless of gender, race, disability, age, religion/belief and sexual orientation and, in so doing, promote equality. One possible exception to this, recorded above, is the accommodation of a policy for gypsy travellers and travelling showpeople which complies with Scottish Planning Policy. All those affected by the planning system should benefit from the measures intended to improve the quality of the built environment, social infrastructure, and economic health. (see SD5 Proposed FIFEplan EqIA pages 2-3)

It is therefore considered that no additional promotion of equal opportunities is required in FIFEplan.
Protected open space

Kevin O’Kane (1937) Fife Council considers there would be merit in designating areas of open space identified in the Fife Greenspace Audit as protected open space in FIFEplan and invites the Reporter to make an appropriate recommendation on this matter.

Action Programme

Scottish Environment Protection Agency (3301) Fife Council intends to review the format and structure of the Action Programme for the Adopted Plan. The suggestions made will be assessed as part of this review.

Typographical Errors

Alfred Stewart Property Foundation Ltd (1947): A number of typographical errors have been identified in the proposed FIFEplan document, these have been amended prior to the examination.

Reporter’s conclusions:

The consultation process

1. Scottish Government expects engagement with the community to occur from the earliest stages in the plan making process. Minimum requirements for consultation and engagement for each stage of local development plan preparation are set out in legislation. A “participation statement” included in the Fife Development Plan Scheme (December 2013) sets out the council’s proposals for public involvement in the preparation of the FIFEplan. The council’s Report of Conformity with the Participation Statement (June 2015) explains how the council has met the requirements of its participation statement.

2. I note from its contents that the council has met and in several cases gone beyond the minimum statutory consultation requirements. For example:

- An additional participation stage before preparing the Main Issues Report called “Community Matters”
- An additional opportunity to comment on the “Development Strategy” before the proposed plan was finalised
- A 12 week consultation period for community matters (2012), 8 weeks for the Main Issues Report (2013), 8.5 weeks for the Development Strategy (2013/2014) and 6 weeks for the proposed plan (2014). The minimum statutory requirement is 6 weeks
- Neighbour notification was carried out within 30 metres rather than the minimum 20 metres

3. I am also aware that the council sought to raise awareness of the consultation process in the following ways:

- Copies of the proposed plan and maps were sent out to Community Councils for their area and were available at 57 local libraries
- Site assessments were published and updated alongside the Main Issues Report, Development Strategy and proposed plan
4. The council promoted the use of web based forms of consultation but also provided paper consultation documents at libraries and written representations were accepted at all stages. I can understand how those who are not computer literate would find the web based material confusing and hard to manipulate but I am satisfied that, overall, there was an adequate mix of consultation techniques available to allow the involvement of both those who are computer literate and those who are not, in the plan preparation process.

5. Representations refer to the inadequacy of the 6 week consultation on the proposed plan in 2014 in particular. However, this was only one of 4 separate opportunities for public involvement which started in 2012 and a 6 week consultation period does meet the statutory minimum period. I am also aware that additional time to respond was given to those Community Councils who requested it due to the elections.

6. Following 2 further information requests I wrote to the council on 29 September 2015 to confirm that I agreed that it had complied with its participation statement and that the requirements of section 19(4) of the Town and Country Planning (Scotland) Act 1997 (as amended) had been met. While acknowledging that the process may sometimes appear overly complicated and bureaucratic and the concerns about the lack of transparency and adequacy of the forms of consultation, I find that the overall level of consultation undertaken by the council was appropriate.

7. I agree that the site numbering could lead to confusion and welcome the council’s commitment to investigating alternative numbering methods for use in the future. I also note the council’s intention to take on board comments regarding lack of clarity overall with a view to learning lessons that will help to make future Local Development Plans more user friendly.

8. The promotion of sites by developers during the “call for sites” period is a standard part of the plan preparation process as is the opportunity for members of the public to comment on the sites promoted and to identify sites they consider suitable for development or areas deserving protection. Planning applications can be submitted and considered by the council outwith the plan-making process. There is, however, an opportunity for the public to comment on any such planning applications as part of the statutory planning process.

9. Taking all of the above into account, I do not recommend any modifications to the proposed plan as a result of the representations on this issue.

One plan for Fife

10. I accept that a single plan for a large and diverse area such as Fife can appear complex but a degree of complexity is inevitable in a document that sets out the development strategy and policies for the whole council area. Furthermore, I do not
consider that bringing all of the policies for the area together into one document is any more complex or incomprehensible than having 3 separate plans with 3 separate sets of policies for the same council area. The preparation of one plan provides the opportunity for a consistent set of policies which cover the whole of Fife and a unified Fife-wide strategy.

11. This examination report recommends various changes to the content of the proposed plan but I do not recommend any changes in relation to this issue.

Outdoor sports facilities

12. With regard to whether outdoor sports facilities are to be retained for community use on land allocations promoting the redevelopment of former educational establishments, I note that the representor does not specify particular land allocations where the contended lack of clarity might give rise to a difficulty. I note the council’s response that the retention of outdoor sports facilities is not required unless specifically stated and that if an educational establishment is being replaced, replacement outdoor sports facilities will be provided. I am satisfied that the council’s response means that outdoor sports facilities will be required where necessary. I conclude that there is no need to alter the proposed plan in response to this part of the representation.

13. Other parts of the representation are considered under Issue 2c (Policy 10).

Settlement statements

14. I note the concern expressed about the lack of settlement statements for any town or village. However, the “Fife Spatial Strategy” chapter of the proposed plan includes a spatial strategy diagram (figure S3), nine topic sections and descriptions of nine area strategies. I find that this, taken with the specific allocations shown on the proposals map and its numerous insets, provides adequate information of the kind referred to in the representation.

Glossary

15. I find that the convention adopted in Scottish Planning Policy is to print in a distinctive colour those terms that are defined in its glossary. If the same device were adopted in the proposed plan, the plan’s meaning would be clearer and less likely to be misinterpreted. There might be drawbacks in terms of printing costs and loss of colour when black-and-white means of reproduction were employed.

16. On balance, I conclude that the best way to address the concern that has been raised would be to insert additional text in chapter 3: Role and Purpose. This would draw the reader’s attention to the existence of the Glossary.

17. The representor seeks a number of alterations to definitions in the Glossary.

18. I agree that the definition of “brownfield” should be altered to accord with the definition in Scottish Planning Policy.

19. I find that the definition of “development”, where it refers to certain acts, should be altered slightly in the interests of accuracy.
20. I agree that the definition of “development brief” should be altered in the interests of accuracy.

21. The representor refers to the definition of “Effective housing supply” and says that this should be amended to read “Effective housing land supply”. I agree that this latter is the correct term. I also note that the definition that follows is worded differently from that used in Scottish Planning Policy. I agree with the council’s suggestion that the wording should be adjusted to accord with that used in national policy.

22. I agree that the definition of “environmental impact assessment” should be corrected.

23. I agree that the definition of “established housing land supply” should be altered to accord with the definition in Planning Advice Note 2/2010: Affordable Housing and Housing Land Audits.

24. The definition for “urban use” in the definition for “greenfield site” follows that contained in Planning Advice Note 2/2010. I find “urban use” to be reasonably clear in meaning. For these reasons, I conclude that the definition of “greenfield site” need not be altered.

25. I agree with the representor and the council that the definition of “green transport plan” requires adjustment. Such plans do not apply solely to car travel for business purposes.

26. I agree with the representor and the council that the definitions of “housing demand”, “housing land requirement” and “housing need” should be reworded to accord with Planning Advice Note 2/2010. These alterations introduce the term “housing requirement”. The Planning Advice Note definition of this term should be added to the Glossary.

27. I agree that clarification should be provided at the end of the definition of “planning customer guideline” to ensure there is no confusion with supplementary guidance.

28. An adjustment to the definition of “special needs housing” would bring the definition more closely into alignment with the explanation of specialist provision that is given in table 6 on page 36 of Housing Need and Demand Assessment - A Practitioner’s Guide (2014), published by the Scottish Government. For this reason, the definition should be adjusted.

29. The representor and the council agree that the definition of “supplementary guidance” should be altered. I agree that alteration is needed to reflect the statutory status of such guidance.

30. The representor and the council agree that the definition of “windfall site” should be altered to accord with the definition in Scottish Planning Policy. I agree that this alteration should be made in the interests of clarity.

31. I find that clarity is best served by avoiding use of abbreviations. Thus the use of “LDP” in paragraph 2 on page 5 of the proposed plan would be better written as “Local Development Plan”. I accept that use of “LDP” may be justifiable on occasion, for example in figure 2.4 on page 197 of the proposed plan. This being so, I agree that
“LDP” should be included in the Glossary.

32. Regarding “material consideration”, I agree that it would be helpful to include a definition in the Glossary. I have noted the definition suggested by the council. There is a slightly fuller explanation in A Guide to the Planning System in Scotland, published by the Scottish Government in 2009. In my view, the latter provides the basis for a more helpful definition in the Glossary.

Huts

33. The representations referring to the Thousand Huts campaign and contending that huts are a benign form of development that should easily meet the six qualities of successful places do not specify what change, if any, should be made to the proposed plan.

34. I note that Scottish Planning Policy (paragraph 79), in the context of promoting rural development, says that plans should set out a spatial strategy which, among other things and where appropriate, “sets out policies and proposals for leisure accommodation, such as holiday units, caravans and huts”.

35. I find that Scottish Planning Policy does not require all plans to make explicit reference to huts. In the present case, I have not been made aware of such factors as the existence of a special demand for huts in Fife and the existence of locations that would be particularly appropriate for huts. In addition, I would wish to know what safeguards might be put in place to ensure that any new huts were as benign as depicted in the representations. I am satisfied that such proposals could be adequately considered under Policy 7: Development in the Countryside.

36. In all the circumstances, I conclude that the proposed plan should not be altered.

Equal opportunities

37. Planning Authorities are required to perform their functions in a manner which encourages equal opportunities. In addition, the Equality Act 2010 introduced the public sector equality duty requiring Scottish public authorities to have “due regard” to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations. Regulations place specific duties on Scottish public authorities to enable the better performance of the public sector equality duty. These include a duty to assess and review the impact of policies and a duty to publish in a manner that is accessible. The equalities duties are referred to in paragraph 15 of the proposed plan and an assessment has been undertaken by the council of the equality impacts of the proposed plan. I do not consider that further references in the proposed plan are necessary.

Protected open space

38. Scottish Planning Policy states (paragraph 224) that local development plans “should identify and protect open space identified in the open space audit and strategy as valued and functional or capable of being brought into use to meet local needs”.

39. Although two particular sites are mentioned in the representation, I have no information as to how many sites in total, in the opinion of the representor and the council, should be added to those that are already shown as protected open space in the
proposed plan.

40. I note that the proposals map insets designate a number of sites as “protected open space”. I also note that two policies in the proposed plan are relevant. Policy 3: Infrastructure and Services says that, with certain exceptions, development proposals will not be supported where they would result in loss of existing or proposed open space. Policy 10: Amenity says that development proposals must not lead to a significant detrimental impact on amenity in relation to, among other things, loss of playing fields and open space.

41. I have given consideration to the possibility of asking the representor and the council to provide complete lists of all sites that they consider should be included in the plan, along with plans showing locations and boundaries. Such information is essential to permit proper consideration of the representation. It is also needed because any recommendation to alter the proposed plan must be entirely clear and precise in detail. I have decided not to ask for all this additional information for three reasons.

42. First, Policy 3 and Policy 10 afford protection to open space irrespective of whether it is shown as protected open space on the proposals map. Thus omission of an open space site from the proposals map need not necessarily leave the site vulnerable to proposals for development.

43. Second, Circular 6/2013: Development Planning (for example at paragraphs 112 and 113) makes it clear that development plan examinations should be speedy and that it is important that relevant information is provided from the outset.

44. Third, adding new sites to those already designated as protected open space should not be done without being subject to the appraisal and consultation process that has to be followed when a local development plan is being prepared.

45. My conclusion is that there should be no change to the proposed plan.

Action programme

46. The remit of this examination does not extend to the content of the Action Programme. I have no remit to recommend changes to it. This would be a matter for the council.

Typographical errors

47. A representor says that the settlement plans section of the proposed plan contains the following errors.

(a) BUR 009 is allocated for employment but is given a housing capacity of 40.
(b) BUR 010 is allocated for employment but is given a housing capacity of 40.
(c) KDY 006 has an area of 0.2 hectare and a housing capacity of 119.
(d) COW 009 is partly for housing but has no housing capacity figure.
(e) COW 009 is said to have an area of 0.8 hectare and also says that 1 hectare is to be developed for employment.
(f) LPH 002 is allocated for housing but has no housing capacity figure.
48. The representor goes on to say that if the council is unable to provide details, the sites should be removed from the plan. The council says that a number of typographical errors have been identified and have been “amended prior to the examination”.

49. Although there is no explicit legislative provision, I accept that a planning authority may make minor, non-notifiable modifications to the proposed plan, and that these do not require to be considered at the examination. These may include correction of typographic errors, updating references and clarifying aspects of presentation in ways which do not come within the definition of notifiable modifications (see paragraph 86(3) of Circular 6/2013: Development Planning).

50. It seems to me that most, if not all, of the errors alleged in the representation are significant as they put in doubt the intentions of the council. Correction of them, if needed, would require something more than what may be described as minor, non-notifiable modifications. The alleged errors are therefore matters that should be addressed in the examination. With this in mind, a further information request (FIR 19) was issued to the council. The council’s response indicates the following.

(a) The housing capacity figure for site BUR 009 should be deleted.
(b) The housing capacity figure for site BUR 010 should be deleted.
(c) The housing capacity figure for site KDY 006 should be 5.
(d) Site COW 009 should be for employment uses only, not employment/housing.
(e) Under site COW 009, the reference to 1 hectare should be deleted - the site size is 0.8 hectare.
(f) The housing capacity for site LPH 002 should be 50.

51. I find that the proposed plan should be altered in the ways indicated above. This is necessary to remove errors and to make clear what is proposed.

52. In its response to the further information request, the council suggested some further changes to the proposed plan. As these changes do not arise from any representation, they are outwith the remit of this examination. Any minor error may be corrected by the council without formal modification.

**Reporters’ recommendations:**

We recommend that the following modifications be made.

1. In chapter 3: Role and Purpose, insert a new paragraph after paragraph 7:

   “8. The Glossary in the plan explains certain terms that are used in the plan. The reader should refer to it to see which terms have a particular meaning.”

   Following paragraphs should be renumbered.

2. On page 34 of the proposed plan, in the entry for site BUR 009 (South of Lammerlaws Road) delete the housing capacity figure “40”.

3. On page 34 of the proposed plan, in the entry for site BUR 010 (Railway Sidings) delete the housing capacity figure “40”.
4. On page 48 of the proposed plan, in the entry for site COW 009 (Woodend Business Centre) delete “/Housing” from the site description.

5. On page 48 of the proposed plan, in the entry for site COW 009 (Woodend Business Centre) delete “1 ha” from the “Status, additional development requirements, and other information” section.

6. On page 50 of the proposed plan, in the entry for site LPH 002 (Sycamore Crescent) insert under “Est. capacity (Housing)” “50”.

7. On page 110 of the proposed plan, in the entry for site KDY 006 (Katherine Street) delete the housing capacity figure “119” and put instead “5”.

8. In the Glossary, delete that part of the definition of “Brownfield” from “land or a site ……” to “…..shops or houses.” and put instead:

   “land which has previously been developed. The term may cover vacant or derelict land, land occupied by redundant or unused building and developed land within the settlement boundary where further intensification of use is considered acceptable.”

9. In the Glossary, in the definition of “Development” the words in brackets should be deleted and replaced by:

   “a legal definition can be found in the Town and Country Planning (Scotland) Act 1997 as amended by the Planning etc (Scotland) Act 2006.”

10. In the Glossary, delete from the definition of “Development Brief” the words “by the Council”.

11. In the Glossary, delete the entry for “Effective housing supply” and put instead:

   “Effective housing land supply: the part of the established housing land supply which is free or expected to be free of development constraints in the period under consideration and will therefore be available for the construction of housing.”

12. In the Glossary, in the entry for “Environmental Impact Assessment”, delete “Environmental Impact Assessment (Scotland) Regulations 1999” and put instead:


13. In the Glossary, in the entry for “Established housing land supply”, delete the definition and put instead:

   “The total housing land supply - including both unconstrained and constrained sites. This will include the effective housing land supply, plus the remaining capacity for sites under construction, sites with planning consent, sites in adopted local development plans and where appropriate other buildings and land with agreed potential for housing development.”
14. In the Glossary, in the entry for “Green Transport Plan” delete the definition and put instead:

“A package of measures aimed at promoting more sustainable travel choices and reducing reliance on the car.”

15. In the Glossary, in the entry for “Housing demand” delete “the demand reflects ….. in a housing market.” and put instead:

“The quantity and type/quality of housing which households wish to buy or rent and are able to afford.”

16. In the Glossary, delete the definition for “Housing Land Requirement” and put instead:

“The amount of land required to be allocated for housing to meet the identified housing requirement.”

17. In the Glossary, delete the definition for “Housing Need” and put instead:

“Refers to households lacking their own housing or living in housing which is inadequate or unsuitable, who are unlikely to be able to meet their needs in the housing market without some assistance.”

18. In the Glossary, insert the following new item:

“Housing requirement: The total amount and type of housing necessary to accommodate a given or projected population at appropriate minimum standards. This includes both housing need and demand.”

19. In the Glossary, insert the following after the definition of “Landscape Character Assessment”:

“LDP: see Local Development Plan.”

20. In the Glossary, insert the following after the definition of “Masterplan”:

“Material Consideration: A material consideration is a planning issue which is relevant to an application for planning permission. Material considerations can include national policy, comments by the public and by organisations the council has consulted, the design of the proposed development and the effect of the proposed development on the environment. The council will decide how important these material considerations are.”

21. In the Glossary, add the following at the end of the definition for “Planning Customer Guideline”:

“Such guidance notes are not formally approved by the Council. They should not be confused with supplementary guidance.”
22. In the Glossary, in the entry for “Special needs housing” delete the definition and put instead:

“Housing specifically intended for use by particular groups, including housing for wheelchair users, older people with additional needs, those with disabilities, people with learning difficulties and non-permanent accommodation (including for students, migrant workers, asylum seekers or refugees).”

23. In the Glossary, in the entry for “Supplementary Guidance” delete the definition and put instead:

“Supplementary guidance is formal guidance that has been the subject of public consultation, has been approved by the Council and has been submitted to the Scottish Ministers. Supplementary guidance forms part of the local development plan. Provisions regarding supplementary guidance are set out in section 22 of the Town and Country Planning (Scotland) Act 1997 as amended by the Planning etc (Scotland) Act 2006 and in regulation 27 of the Town and Country Planning (Development Planning) (Scotland) Regulations 2008.”

24. In the Glossary, delete “Windfall site” and its definition and put instead:

“Windfall Sites: sites which become available for development unexpectedly during the life of the development plan and so are not identified individually in the plan.”
### Issue 2a

#### Development Principles

**Development plan reference:** Policy 1 (pages 189-192)

**Reporter:** Robert Maslin

**Body or person(s) submitting a representation raising the issue (including reference number):**

<table>
<thead>
<tr>
<th>Scottish Natural Heritage (912)</th>
<th>Miller Homes East Scotland Ltd (2099)</th>
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<tr>
<td>The Theatres Trust (951)</td>
<td>Linlathen Developments (Tayside) Limited (2135)</td>
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<td>Hammerson (Kirkcaldy) Ltd (953)</td>
<td>A &amp; J Stephen Ltd (2162)</td>
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<td>Scottish Enterprise (1049)</td>
<td>J G Lang &amp; Son (2192)</td>
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<td>Jacobs (1172, 1183)</td>
<td>J Watchman (2520)</td>
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<td>Royal Yachting Association (1771)</td>
<td>The Coal Authority (2741)</td>
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<td>Ceres and District Environment and Amenity Protection Group (1812)</td>
<td>Gladman Developments Ltd (2747)</td>
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<tr>
<td>Stewart Milne Homes (1823, 1825)</td>
<td>P M Uprichard (2801)</td>
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<td>Homes for Scotland (1829)</td>
<td>RSPB Scotland (2826)</td>
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<td>Network Rail (1849)</td>
<td>Hallam Land Management Ltd (3000)</td>
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<td>Landvest PCC Ltd (1903)</td>
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<td>Taylor Wimpey UK Limited (1936)</td>
<td>Avant Homes (3702)</td>
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<td>Persimmon Homes (East Scotland) (1986)</td>
<td>Lynch Homes (3712)</td>
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<td>Stirling Developments (2037, 3681)</td>
<td>Lomond Group (3732)</td>
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<td>Royal London Asset Management (2040)</td>
<td>The William Brown Trust (3889)</td>
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<td>Wemyss Estate Trustees (2078)</td>
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**Provision of the development plan to which the issue relates:** Policy 1 Development Principles (pages 189-192)

**Planning authority’s summary of the representation(s):**

Scottish Enterprise (1049): Policy 1 clear and explicit but might not be flexible enough to determine all development proposals for new employment uses. Additional wording required to protect employment land and provide flexibility for new economic development.

Theatre Trust (951): Support for Policy 1 Part B as it includes wording to protect community and cultural facilities.

Scottish Natural Heritage (912): Support for policy 1 in its current form but would request to discuss any changes following Examination particularly in wording that may affect the Habitat Regulations requirements.

Hammerson (Kirkcaldy) (953), Network Rail (1849), Wemyss Estate Trustees (2078), Royal London Asset Management (2040): Part A of Policy 1 should refer to other types of development to allow them to come forward and meet the requirements of the Plan.

Jacobs (1172, 1183): Additional wording should be added to Policy 1 to allow for wind energy development to be acceptable under Policy 1 A. also Policy 1 B is too rigid and
does not allow for development to come forward that does meet all of the criteria. Amenity Protection Group (1812), Graham Russell (1771): Inclusion of a reference to recreational facilities under Part B, 2.

Stewart Milnes Homes (1825, 1823), Homes for Scotland (1829), Taylor Wimpey (1936): Potential confusion between the wording of Policy 1 Part A 1 and Policy 2. Changes to requested to clarify the relationship between the two.

Homes for Scotland (1829), Lynch Homes (3712), Avant Homes (3702): The policy should not refer to housing shortfalls being met by housing market area, rather it should reflect the provisions of SESplan and allow a shortfall to be met across SESplan Fife.

Persimmon Homes (East Scotland) (1986): More information is need to identify how a shortfall will be identified and concern raised that the Housing Land Audit will be used as it does not reflect the views of the development industry due to the Council often ignoring their opinions. Change to Policy 1 Part B 7. as the current wording is unnecessarily negative.

Miller Homes (2099): Changes required to reflect wording of Scottish Planning Policy and provide greater support for development adjacent to settlements.

Landvest PCC Ltd (1903), J G Lang & Son (2192), Linlathen Developments (Tayside) Limited (2135), A & J Stephen Ltd (2162), Gladman (2747): Support for Policy 1 as it provides a mechanism for dealing with any shortfall in housing land and importance of housing in encouraging economic growth.

Stirling Developments (2037, 3681): Design briefs and development frameworks mentioned under Policy 1 Part C should be agreed between the Council and the developer promoting the site.

J Watchman (2520): Text in Policy 1 Part A implies that development not meeting this section will be not supported. This is not the case and text should be revised.

J Watchman (2520): Difficult to understand the differential between the reference where development ‘will’ be supported or ‘may’ be supported.

J Watchman (2520): Support for sustainable development should be increased through reference to national circular 17/1985.

P M Uprichard (2801): Plan is bias towards economic growth in the form of employment land or housing as the expense of truly sustainable development, which is exacerbated by the presence of only 15 policies.

Coal Authority (2741): Support for the inclusion of text accompanying Policy 1 which highlights the need to consider coal mining legacy issues during the implementation of the plan.

RSPB Scotland (2826): Support for reference to the need to address cumulative impacts and the explicit requirement of the implementation of green networks.

Hallam Land Management Ltd (3000): Support for Policy 1 as a context for promoting sustainable development but concern that the mechanism for dealing with housing land
shortfalls does not correspond with SPP paragraph 29, 33 and 125.

SEPA (3281): Support for various elements of Policy 1. Issues supported are:

- Requirement to implement the zero waste hierarchy and subsequent compliance with Scottish Planning Policy;
- Requirement for development to minimise impact on the water environment and the commitment to the implementation of sustainable urban drainage systems.
- The need for development to avoid flooding;
- The need for development to demonstrate that it has addressed energy conservation and generation within its layout.

Lomond Group (3732): Support for Policy 1 due to its compliance with the aims of Scottish Planning Policy and ability to address any shortfall is housing land.


In particular, the application of a clear sequential test process for supporting potential residential sites where an identified land supply shortfall exists is welcomed as is the recognition of the presumption in favour of development that supports sustainable development identified in revised Scottish Planning Policy.

### Modifications sought by those submitting representations:

Scottish Enterprise (1049): Add text to Part A 2 a. to protect existing strategic employment sites from addressing a housing land shortfall. Also add text to Part A 2 b. to allow flexibility in accommodating new economic development proposals.

Theatre Trust (951): None requested apart from minor factual change to refer to policy 3 not 4 under Part B 2.

Scottish Natural Heritage (912), Landvest PCC Ltd (1903), J G Lang & Son (2192), Linlathen Developments (Tayside) Limited (2135), A & J Stephen Ltd (2162), Gladman (2747), Coal Authority (2741), RSPB Scotland (2826), SEPA (3281), Lomond Group (3732), William Brown Trust (3889): None sought.

Hammerson (Kirkcaldy) (953), Network Rail (1849), Wemyss Estate Trustees (2078), Royal London Asset Management (2040): Additional wording should be added to Part A 2. To allow other types of development to be considered as exceptions to Part A 1.

Jacobs (1172, 1183): Change wording of Policy 1A to include reference to wind energy spatial frameworks, change wording at start of Part B to lessen requirement for development proposals to meet the sustainability criteria in the policy and make reference to Policy 11 under Part B Criteria 5.

Amenity Protection Group (1812), Dr Graham Russell (1771): Inclusion of a reference to recreational facilities under Part B, 2.

Stewart Milnes Homes (1825, 1823), Homes for Scotland (1829), Taylor Wimpey (1936): Change wording of Policy 1 Part A2 (a) to cross refer to Policy 2.
Homes for Scotland (1829), Lynch Homes (3712), Avant Homes (3702): Change Policy 1 Part A 2 (a) to refer to SESplan Fife rather than housing market areas.
Persimmon Homes (East Scotland) (1986): Addition of text explaining how a shortfall in housing will be evidenced. Also change to wording of Policy 1 Part B 7. To allow development to reflect the character of the landscape ‘where possible’.
Miller Homes (2099): Add wording to either Policy 1 Part A 1 or Part A 2 to refer to support for edge of settlement development.

**Summary of responses (including reasons) by planning authority:**

Policy 1 has been designed to identify the key principles that will determine both the process through which a development proposal will be determined and which they must address to be recommended for permission.

Part A supports the primacy of sites identified in the local development plan. A site not meeting this part of the policy does not mean it will be unsuccessful, it simply means that it will be seen as contrary to the plan and will be subject to the process that this categorisation requires. This is no change from the present and simply clarifies current practice.

The other two parts of the policy are deliberately concise and avoid description of policy detail or guidance on how to address each of the bullet points. This is provided in the supporting policies which Policy 1 is clearly linked to.

Not all the criteria will be relevant for every application. However where they are relevant they must be addressed to the satisfaction of the Council. Part B and C are not anti-development but are pro sustainable development in the spirit of Scottish Planning Policy. Wording changes suggested through the representations to allow developers to ‘have regard to’ or ‘where possible’ to address various of the criteria would make the policy weak and allow sub-standard development proposals to be argued as meeting the requirements of the Local Development Plan.

Scottish Enterprise (1049): The Council agrees with the need to protect all types of employment land from other development types, particularly strategic employment land. This issue is covered in Policy 1 Part A and in more depth in Policy 5. Policy 1 Part B also highlights the need for there to be no net loss of employment land in key settlements. These two references make the need to have an additional reference in Policy 1 unnecessary. Scottish Enterprise is particularly concerned about the potential loss of employment land as a result of the plan’s policy in relation to maintaining an effective five year housing land supply. Taking this into account, Fife Council considers that there may be merit in adding additional text to the plan to clarify the policy position with regard to these potentially competing policy positions. The detail of policy relating to housing shortfalls is set out in ‘Applying Policy 2: Homes’, and is therefore considered to be the most appropriate section of the plan to make such a change. An additional sentence could be added to paragraph 5 on page 195 stating that ‘The release of housing land to address a shortfall in the effective five year housing supply will not outweigh the policy protecting employment land, set out in Policy 5: Employment Land and Property’. Fife Council invites the Reporter to make an appropriate recommendation on this issue.
In relation to the flexibility recommended for inclusion in Policy 1 Part A criterion 2 b), the purpose of the wording is understood given the often speculative nature of business development. Fife Council recognises that there are situations in which material considerations (such as job-creation) will be determining factors in the consideration of proposals. The Proposed Plan sets out (in Paragraph 9 of ‘A guide to the FIFEplan policies, page 189) that there will be instances where opportunities for development on sites not identified in the plan can be considered acceptable in planning terms if there is an overriding planning justification. Therefore no change is recommended.

Theatre Trust (951): Support noted and welcomed, change to policy reference should be changed. Policy 1, Part B criterion 2 should link to Policy 3, not Policy 4.

Scottish Natural Heritage (912): Recognise the importance of meeting the requirements of the Habitat Regulations and will keep SNH informed of any changes to policy wording that may affect this policy area.

Hammerson (Kirkcaldy) (953), Network Rail (1849), Wemyss Estate Trustees (2078), Royal London Asset Management (2040): The preferred route through which development is identified is the development plan. Part A 1. relates to many types of development when they are identified in the LDP. If they are in the plan then they are supported by Part A and must then be considered against Part B and C. The plan must recognise the importance of the development plan and of sites in the plan, as opposed to windfall/speculative proposals given the allocated sites have been considered through the LDP process. The further criteria introduced in Part A 2. Relate to addressing specific deficiencies in land supply and to add a reference to certain other uses being acceptable would be to open and general. This will not prevent development coming forward that is not identified in the plan. It will mean that speculative developments, which do not meet the requirements of Policy 1 (A) will be judged as at least contrary to the development plan. This is the same as happens at present and the Policy is simply clarifying the process through which developments will be dealt with. Therefore no change required.

Jacobs (1172, 1183): The change requested would give an area of search for wind farms the same status as sites identified in the LDP for a specific use. This is not appropriate as the areas of search are only a guide to where development may be acceptable and proposals still require to be assessed against the policies of the plan through the development management process. Therefore no change is needed and to accept the proposed alterations to the plan would promote the status of the spatial framework to one beyond which it is intended.

In terms of changing the wording of Part B, the comments state that it may be preferable to introduce flexibility to the wording of the plan to allow development proposals which generally meet the requirements of the plan. This change is requested with the aim of promoting sustainable development.

The reason the wording in the plan has been adopted is to ensure that all relevant issues are fully addressed to achieving sustainable development. To change the wording to ‘seek to demonstrate’ opens the door to proposals arguing their acceptability based on a cursory consideration of more challenging but important sustainable criteria. The proposed change would severely weaken the policy which has been designed to promote sustainable development and ensure that there is no flexibility in proposals avoiding addressing relevant criteria. Therefore no change is proposed.
The representative does not identify which of the criteria they see as being a hindrance to the implementation of sustainable development.

The third point about adding a reference to Policy 11 under Part B Criterion 5 makes sense, as wind farms and other energy generation technologies are often acceptable in the countryside. As such the Council considers there is merit in amending the wording and invites the Reporter to make an appropriate recommendation on this issue.

Amenity Protection Group (1812), Stewart Milne Homes (1823), Graham Russell (1771): The protection of recreational facilities is recognised as being important. The Policy and the supporting text in Policy 3 refers to the need to protect leisure facilities including open space and this was intended to cover recreational facilities. Therefore this change is not seen as being necessary. While this change is not deemed necessary if it were to be accepted then it would not harm the policy aims of the plan.

Stewart Milne Homes (1825, 1823), Homes for Scotland (1829), Taylor Wimpey (1936): The recommended change to amend the wording of Policy 1 Part A2 (a) to cross refer to Policy 2, would make the plan clearer and does not affect the intention of the strategy to allow development to come forward to address a housing land shortfall using the methodology highlighted in Policy 2. As such the Council considers there is merit in amending the wording and invites the Reporter to make an appropriate recommendation on this issue.

Homes for Scotland (1829), Lynch Homes (3712), Avant Homes (3702): It is accepted that SESplan, in terms of its spatial strategy and distribution of housing, has seen the whole of its areas as one housing market area. However it is common place to use smaller housing market areas. This approach was used in the Fife Structure Plan and will be used in SESplan 2. It reflects more accurately the geographies over which house sales take place and provides continuity from the existing Local Plans.

SESplan does not make comment on the approach of using smaller scale housing market areas and therefore the Local Development Plan is not in conflict with SESplan and no change is required.

This issue is covered further in the Housing Paper which supports the Homes Schedule 4.

Persimmon Homes (East Scotland) (1986): The methodology for identifying a housing land shortfall is identified under Policy 2. It does include a role for the Housing Land Audit which is the most consistent and accurate reflection of the housing land situation available. The comments about the views of the industry being ignored are not reflective of the annual Fife Council Housing Land Audit process. There are sites where the industry representatives and the Council have different views but these are recorded as disputed sites and the views of the industry are not ignored. These are sometimes included in the effective supply. However the reason for the dispute is often information from landowners or agents which other industry representatives do not agree with. Therefore no change is required as the methodology for addressing a shortfall in housing land is already identified under Policy 2.

Policy 1 is framed in a manner which requires development proposals to meet certain sustainability criteria. To introduce wording such as ‘where possible’ introduces an opportunity for those proposing to argue that it is not possible to address landscape
character which is something the Council wants to avoid. It is entirely appropriate that
development should reflect the character of the landscape. This will not prevent
development but will ensure that it reflects the character and topography of an area. This
need not add cost to development but simply ensure that they are of a high quality.

It is unclear why this change has been requested as developers are expected to want to
ensure that their developments are of the highest quality and reflect the characteristics
of the area. Therefore no change is needed.

Miller Homes (2099): Policy 1 A 1(a and b) relate to sites that have been identified in the
Local Development Plan through the scrutiny which this process allows. Development
proposals complying with this part of the policy will not be contrary to the plan. To
introduce an arbitrary support for edge of settlement development would conflict with the
aims of this part of the policy. Such sites should be contrary to the plan as they have not
been identified for the use in question.

Part A 2. Relates to 2 other instances where development would not be contrary to the
plan, if it were proved to be addressing deficiencies in land supply. It may well be that a
site coming forward under Part A 2. (a) would be edge of settlement but the suitability of
this use of the site would need to been proved through the methodology identified in
Policy 2.

To include a blanket acceptance of edge of settlement development would undermine
the purpose of the development plan as it would put all edge of settlement proposals on
the same footing as those identified in the plan. It would also be far too open ended as
there would have been no assessment to determine the need for the site in the first
place. Therefore no changes are proposed to the policy and the changes proposed
would undermine the purpose of the development plan proposals and spatial strategy.

Landvest PCC Ltd (1903), J G Lang & Son (2192, Linlathen Developments (Tayside)
Limited (2135), A & J Stephen Ltd (2162), Gladman (2747), Coal Authority (2741), RSPB
Scotland (2826), SEPA (3281), Lomond Group (3732), William Brown Trust (3889): Support welcomed and noted.

Stirling Developments (2037, 3681): When design briefs etc are being prepared there
will be some key elements that the Council will want to include, such as retention of
trees. However, in general the process will be undertaken in conjunction with the
developer, with those promoting the site often preparing the brief. Policy 1 is not the best
place to include wording which deals with how the policy will be undertaken. This type of
description is reserved for the ‘Applying the Policy’ sections.

Page 244 paragraph 3 sets out text which highlights the need for developers to agree
site briefs or framework with the council. This sufficiently covers the issue and no
change is required.

J Watchman (2520): The purpose of Part A of Policy 1 is to highlight the primacy of the
development plan and the importance of supporting the principle of uses in locations that
have been considered through the Local Development Plan process.

The respondent rightly points out that a development not according with Part A could still
be granted planning permission. The wording of the policy relates to the support for
development that is proposed on sites in the LDP or that meets a shortfall. It does not
rule out other development being supported, if it meets the requirements of the plan.

This issue is covered in the text accompanying Policy 1, in paragraphs 11 and 12, page 189. Therefore no change is required.

J Watchman (2520): The first part of the policy refers to the principle of development of a site. If a development proposal is for the use identified in the Local Development Plan then the principle of development will always be supported.

Just because there is a shortfall there is not an automatic assumption that development will be acceptable. The development proposal would have to be considered against the methodology outlined in Policy 2, and other relevant supporting policies, and it is down to the Council to accept that there is both a shortfall and that the site offers the best opportunity to address this shortfall. The test outlined in the methodology would need to be met irrespective of the presence of a housing land shortfall. Therefore no change to the text is required.

J Watchman (2520): There are numerous references throughout the Plan to SPP which is based on sustainability principles. The premise of the LDP and particularly Policy 1 is to ensure that development goes in the right place and addresses all its impacts which collectively will ensure sustainability in development. Therefore there is no need to mention other documents or Circulars which promote sustainability. As with other Circulars, by not mentioning them in the plan it does not mean that the plan does not have to conform to their principles.

P M Uprichard (2801): Part A of Policy 1 does not only refer to employment land and housing. It supports the principle of any type of development identified in the Local Development Plan. It specifically highlights means of addressing shortfalls in housing and employment land as these are two uses which we are bound by SDPs to maintain a supply.

One of the aims of Policy 1 is to bring together all the key principles that will ensure sustainable development and given them a clearer equal footing. The wording is clear that development proposals must address the relevant points in Parts B and C in Policy 1 to be acceptable. This includes all issues, not just housing or employment land. Therefore no change is required as the policy currently supports sustainable development.

The reduction in the number of policies, again, does not deflect from the sustainable aims of the plan. It focuses on the impacts that development will have to satisfactorily address, rather than the use itself. By doing this it frames the policies in a manner that is closer to the process that an application will be considered through the development management process. Often the decision on an application will centre, not specifically on the use proposed, but based on the impact it will have on its surroundings. There are many common impacts that require to be addressed irrespective of the proposed use and it is and this that the policy approach is addressing. This approach also avoids the considerable duplication in the existing policies where there were numerous references to the need to address issues like environmental impact, transport impacts, amenity and provide high quality design. No change necessary and if the policy were changed in the way requested then it would prevent the proper functioning of the plan due to the drift away from policy principles to a use based policy approach.
Hallam Land Management Ltd (3000): Due to the timing of the Local Development Plan and the publication of the new Scottish Planning Policy it is the 2010 version of Scottish Planning Policy the plan is significantly based on. However, the wording of the plan does conform with both the 2010 and the 2014 SPP as it addresses the issue of housing land shortfall and then sets out how this should be resolved. The mechanisms mentioned in Part A of Policy and covered further in Policy 2 relate the how the presence of a shortfall will be agreed. Irrespective of which version of Scottish Planning Policy is used there still need to be agreement of a shortfall before the issue can be addressed. The Local Development Plan provides the context for doing this. Once the presence of a shortfall has been agreed it does not automatically follow that the site will be acceptable. It still has to be in the right place and address it various impacts on its surroundings and this is what the remainder of Policy 1 sets out to achieve. This supports sustainable development which in turn reflects Scottish Planning Policy. As a result there is no conflict between FIFEplan and Scottish Planning Policy on this issue and no change required.

Reporter’s conclusions:

Protecting employment land

1. I find that the wording of Policy 1 Part A 2(a) could be interpreted as opening the door to housing development on employment land in a situation where there is a shortfall in housing land supply. In my view this would be undesirable. It is important that employment opportunities are protected and encouraged across a range of sites to help promote economic activity and reduce the length of journeys to work.

2. The council suggests adding wording to the text supporting Policy 2: Homes. In my view this would not be an adequate response to the concern of Scottish Enterprise. The wording of policies normally takes precedence over supporting text. This being so, consideration must be given to the wording of Policy 1.

3. I note that the second sentence of Policy 1 includes: “Development proposals must ….. conform to all applicable requirements in Parts B and C.” Part B, criterion 3 says: “Ensure there is no net loss of employment land within key settlements”. It also includes a cross-reference to Policy 5: Employment Land and Property. Policy 5 safeguards all existing and allocated employment land, and it sets out the circumstances for considering changes of use from employment land.

4. In addition to its representation relating to Policy 1, I note that Scottish Enterprise has made representations to Policy 5 and other parts of the proposed plan dealing with employment land. In my view, the general underlying concern of these representations is the effective protection of the employment land supply. In response to a further information request (FIR 9) concerning Policy 5, the council has confirmed that there is an inconsistency between Policy 1, Part B, criterion 3 and Policy 5, and that it wishes to adopt the approach of Policy 5. I believe that both the specific concern of Scottish Enterprise relating to Policy 1, Part A 2(a), and the general underlying concern, can both reasonably be addressed by changing criterion 3 to refer to the protection of existing and allocated employment land. This change would also make the 2 policies reasonably consistent. See also Issue 2d – Employment land.
Flexibility for new economic development

5. I find that the wording that Scottish Enterprise proposes to add to Part A 2(b) of Policy 1 is in very general terms. Paragraph 9 on page 189 of the proposed plan says that development on unallocated sites may be acceptable if there is an overriding justification. I find that this makes adequate provision for the flexibility that Scottish Enterprise seeks.

Scope of Policy 1, Part A

6. The first sentence of Part A of Policy 1 sets out clearly circumstances in which certain development proposals will be supported. In my view this is entirely acceptable. The second sentence introduces a qualification, in that it says that development proposals must meet certain requirements. I find an ambiguity here. The qualification could be interpreted as applying to the first sentence, or it could be interpreted as a separate requirement operating independently of the first sentence.

7. The ambiguity could be resolved by inserting “Such” at the beginning of the second sentence. This would make clear that development proposals will be supported if they conform to relevant policies and proposals and if they meet one of the points in Part A and conform to requirements in Parts B and C.

8. The change suggested in the preceding paragraph would mean that the first two sentences, taken together, describe what will be supported. The second sentence would no longer be capable of being interpreted as saying that developments outwith its scope will be rejected. This effect of the suggested change would reflect paragraph 9 of the supporting text (page 189 of the proposed plan) which recognises that development on non-allocated sites may be acceptable. It would also meet the concerns that the policy as drafted is overly restrictive.

Incorrect cross-reference

9. I agree that the policy number in the cross-reference attached to criterion 2 of Part B of Policy 1 should be corrected. This can be corrected by the council as a minor error without formal modification.

Renewable energy development

10. Three changes to Policy 1 are sought in relation to renewable energy development.

11. First, it is contended that Part A 1(b) should include reference to wind energy development in locations supported by the spatial frameworks table in Scottish Planning Policy. Justification for this stems from the imperative wording in the second sentence of the proposed policy. If the second sentence were altered in the way I have already suggested, it would no longer have the unduly restrictive effect that is of concern in the representation.

12. Second, the opening text in Part B should be reworded. The new wording would include the phrase “developers should seek to demonstrate”. My suggested alteration to the second sentence in the policy’s introductory text means that Policy 1 is defining which development proposals will be supported and is not saying which development proposals will be opposed. In this context, I find it appropriate for Part B to be
prescriptive and the less demanding requirement sought in the representation would be out of place.

13. Third, criterion 5 of Part B should make reference to Policy 11: Low Carbon Fife. I agree that wind farms and other energy generation often require a countryside location and that criterion 5 should be expanded as suggested.

Scope of Part B, criterion 6

14. Regarding sport and recreational facilities, I note that criterion 6 refers to Policy 10: Amenity. Policy 10 seeks to protect the amenity of existing land uses. It also refers to loss of playing fields, open space and green networks. Elsewhere in part B of Policy 1, criterion 2 refers to loss of cultural, tourism and community resources. The related policy is Policy 3: Infrastructure and Services. Policy 3 seeks to protect cultural, tourism and community resources and open space.

15. One of the Policy Principles in Scottish Planning Policy (paragraph 29) is: “improving health and well-being by offering opportunities for social interaction and physical activity, including sport and recreation”. Subject to certain exceptions, outdoor sports facilities should be safeguarded from development (Scottish Planning Policy, paragraph 226).

16. In view of its importance, I find that it would be appropriate to make specific reference to sport and recreation in criterion 6. If this were done, Policy 3 should be added to the cross reference.

Relationship to Policy 2: Homes

17. I note that Policy 1, Part A 2(a), among other things, is subject to the two opening sentences of the policy. These sentences invoke Parts B and C of the policy. This provides a somewhat different approach from that in Policy 2. I conclude that confusion could well arise. I note that the council sees merit in the change of wording suggested in the representations.

18. My conclusion is that Policy 1 should be altered to avoid confusion with Policy 2.

Housing market areas

19. I have already found a need to alter the wording of Policy 1, Part A 2(a). The new wording that I am recommending makes no reference to housing market areas. No further alteration is needed in response to the representors.

Ineffective land supply

20. I have already found a need to alter the wording of Policy 1, Part A 2(a). The new wording that I am recommending makes no reference to land supply shortfall. No further alteration is needed in response to this representation.

Landscape

21. I note that the Third National Planning Framework (paragraph 4.4) says that “landscapes have an important role to play in sustaining local distinctiveness and cultural
identity, and in supporting health and well-being”. Scottish Planning Policy (paragraph 29) says that policies and decisions should be guided by a number of principles, including “protecting, enhancing and promoting access to natural heritage, including green infrastructure, landscape and the wider environment”.

22. In view of the importance that national policy ascribes to landscape, I find it reasonable that the proposed plan should seek to safeguard the character and qualities of Fife’s landscape.

23. I note that criterion 7 is one of eleven criteria in Part B of Policy 1. No other criterion is qualified by a phrase such as “where possible”. I see no reason why landscape should be afforded a lesser standard of protection when compared to these other criteria.

24. My conclusion is that criterion 7 should not be altered.

Edge-of-settlement locations

25. I find that paragraph 40 of Scottish Planning Policy is directed primarily to the formulation of spatial strategies within development plans. Use of edge-of-settlement locations is one of the principles that is to be taken into account in such formulation. Having taken this principle - and many other factors - into account, the development plan will identify sites for new development.

26. I find that paragraph 44 of Scottish Planning Policy does not justify the sought-for change to the proposed plan.

27. I also find that the change would undesirably weaken the strategy of the proposed plan. It would open the door to development on sites that have been scrutinised in the plan preparation process and found not to merit a development allocation.

28. My conclusion is that the proposed plan should not be altered.

Design briefs and development frameworks

29. In my view, the process whereby development briefs are prepared is not a matter that should be prescribed in Policy 1.

30. Criterion 6 in Part C of the policy is accompanied by a reference to Policy 14: Built and Historic Environment. Supporting text for Policy 14 (paragraph 3 on page 244 of the proposed plan) says that there may be a requirement to prepare development briefs, masterplans or design statements. “These will be subject to agreement or approval of the council.” I find that this adequately addresses the concern of the representor.

Circular 17/1985

31. I am aware that there is a large number of circulars that give advice to planning authorities. Planning authorities are expected to follow that advice, whether or not it is quoted in the development plan. I find no justification for making reference to Circular 17/1985 in the proposed plan.
Sustainable development

32. I note that Policy 1 is a “gateway policy” and that it is other policies in the proposed plan that address specific issues, including matters that relate to sustainability. Policy 1 contains numerous cross-references to these other policies.

33. Whether the council has or has not promoted sustainable development in the past is not for me to consider. Representations that raise specific concerns about the sustainability of particular policies in the proposed plan will be considered in relation to the policy in question.

34. Circular 6/2013: Development Planning (paragraph 8) says that Scottish Ministers want development plans to be succinct. The fact that the proposed plan contains fewer policies than the existing adopted local plans is thus not necessarily a defect and may well be a merit. It was open to representors, if they saw fit, to suggest inclusion of additional policies in the proposed plan. Any such representation would be given consideration.

Housing land supply

35. I note that paragraph 29 of Scottish Planning Policy supports accessible housing. Any representations questioning the accessibility of specific proposed housing sites will be given consideration in relation to the site in question.

36. Paragraph 33 of Scottish Planning Policy is primarily directed to situations in which development plan policies are out-of-date or in which the plan does not contain relevant policies. It seems unlikely to me that policies in the proposed plan, once amended in the light of this examination and then adopted, would, at least for an initial period, be out-of-date.

37. Paragraph 125 of Scottish Planning Policy says that planning authorities, developers, service providers and other partners in housing provision should work together to ensure a continuing supply of effective housing land. Where a shortfall in the five-year supply of land emerges, development plan policies will not be considered up-to-date. Matters of housing land supply are considered under Issue 2b.

38. I find that Policy 1, with the alteration to Part A 2(a) recommended below, does not conflict with Scottish Planning Policy.

Reporter’s recommendations:

I recommend that the following modifications be made.

1. In Policy 1: Development Principles, insert “Such” at the beginning of the second sentence so that the sentence reads “Such development proposals must …..”

2. In Policy 1: Development Principles, part A, criterion 2, delete (a) and replace with:

   “Housing on a site which is not allocated for housing in this plan but which accords with the provisions of Policy 2: Homes.”
3. In Policy 1: Development Principles, Part B, criterion 3, delete the text and replace by:

   “Protect Fife’s existing and allocated employment land (see Policy 5 Employment Land and Property);”

4. In Policy 1: Development Principles, part B, criterion 5, delete “and” and insert after “Green Belt” the following: “and Policy 11: Low Carbon Fife”

5. In Policy 1: Development Principles, part B, delete the text in criterion 6 and insert:

   “Protect sport and recreation facilities and the amenity of the local community and businesses (See Policy 3 Infrastructure and Services and Policy 10 Amenity);”
### Issue 2b: Homes

#### Development plan reference:
Strategy – Homes (page 12, paragraphs 10 & 11), Policy 2: Homes (pages 193 – 198)

#### Reporter:
Katrina Rice

#### Body or person(s) submitting a representation raising the issue (including reference number):

<table>
<thead>
<tr>
<th>Homes</th>
<th>Raith Developments Limited (1368)</th>
</tr>
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<tbody>
<tr>
<td>Tina Chapman (4)</td>
<td>Caravan Club (1693)</td>
</tr>
<tr>
<td>Scottish Natural Heritage (904)</td>
<td>Taylor Wimpey plc (1725)</td>
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<tr>
<td>Rob Thompson (1350)</td>
<td>John Collier &amp; Sons (1757)</td>
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<tr>
<td>Raith Developments Limited (1357)</td>
<td>King Group (1758)</td>
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<tr>
<td>Campion Homes Ltd; Mansell Homes; Muir</td>
<td>Tor Property Developments Ltd (1759)</td>
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<tr>
<td>Homes Ltd; The Logie and Pittencrieff</td>
<td>Stewart Milne Homes (1826)</td>
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<td>Estate; The Wilkins Family (1820)</td>
<td>Homes For Scotland (1838)</td>
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<tr>
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<td>Linlathen Developments (Tayside) Limited</td>
<td>Montgomery Forgan Associates (1958)</td>
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<td>(2118)</td>
<td>Homes for Scotland (1983)</td>
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<td>J G Lang &amp; Son (2175)</td>
<td>Persimmon Homes (East Scotland) (1987)</td>
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<tr>
<td>CALA Management Ltd and W B Bayne &amp; Son</td>
<td>Springfield Properties Plc (2026)</td>
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<td>(2210, 2212)</td>
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<td>Stirling Developments (2038)</td>
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<td>J G Lang &amp; Son (2194)</td>
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<td>Lomond Group (3731)</td>
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<td>Hallam Land Management Ltd (2993)</td>
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<td>R Gilchrist (3064)</td>
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<td>Scottish Government (3204)</td>
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<td>Stirling Developments (3682)</td>
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<td>LRH Enterprises (3859)</td>
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<td>The William Brown Trust (3890)</td>
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<td>Beebe Land Ltd (3895)</td>
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#### Provision of the development plan to which the issue relates:
PROPOSED FIFE LOCAL DEVELOPMENT PLAN

Planning authority’s summary of the representation(s):

STRATEGY - HOMES

Tina Champman (4): Existing housing stock which needs to be brought up to habitation standards or other buildings which could be used as housing need to be looked at before allocating more unbuilt-on land for new build.

Scottish Natural Heritage (904): The strategy text for Homes appears to relate specifically to house building rates and housing market areas. Both of these are outwith our remit and we do not believe that it would be relevant to comment on such technical matters.

Raith Developments Limited (1357): Believe that the housing land calculations have not been carried out in the appropriate manner, or for the correct periods, and that the housing land requirement has been underestimated resulting in a shortfall requiring additional allocations to be made, particularly in the short term to enable the plan to be progressed to adoption.

We would respectfully request that the Policy – “Homes” section of the Plan, including Policy 2 and Table 2.4, be revised as set out in our representation to that section.

Request that site in Kirkcaldy North west be allocated.

Rob Thomson (1350): Suggest villages which have no elderly care homes or facilities have a new category of land designated for care homes on flat areas brown or green site which offers developers or other landowners preferential treatment/terms and conditions for offering solutions to shortfall e.g. assistance in cleaning up materials off brownfield sites.

TMS Planning Ltd (1820): Figure 2.4 – no information showing how Fife Council has calculated these figures.

No detailed Housing topic paper.

2014 Housing Land Audit not available to support assessment process.

No programming of sites available.

Unclear how post 2024 requirement is calculated.

Housing land supply lacks any real assessment of effectiveness/delivery.

No settlement assessment has been undertaken.

At the present time Figure 2.4 cannot be relied upon to accurately set out the supply/shortfall/level of additional allocations required. A far more detailed and fully justified assessment of the relevant supply/allocation and delivery requirements is required though the Examination process.

Persimmon Homes (1960): Concern over heavy reliance on housing allocation in tertiary
markets especially Ore/Upper Leven Valley. Point 10 on page 12 which references Fife will ‘provide a continuous effective housing land supply’ also needs to reference Fifes ability to remove allocations which are not delivering.

In order to achieve an effective housing land supply, we believe sites should be reconsidered every two years via SPG.

Cannot fully support a spatial strategy which does not consider deliverability as a key issue to address.

Alfred Stewart Property Foundation Ltd (1953 & 3932): Fife Council has not identified enough land in its Local Development Plan Proposed Plan to meet Strategic Development Plan requirements.

Does not comply with SPP.

The scale of the shortfall in the five year housing land supply is significant and will not be resolved by the current Local Development Plan Proposed Plan or Supplementary Guidance.

To address this, the 8 sites removed By Fife Council Executive Committee should be re-introduced and additional sites should be allocated.

CALA Management Ltd and W B Bayne & Son (2210 & 2212): The Spatial Strategy should reflect a more realistic programme of delivery (at Cupar North) presenting a suite of sites in and around Cupar to deliver the much needed homes up to 2024 and beyond.

Miller Homes East Scotland Ltd (2110): Generally supports the Spatial Strategy as set out in the Proposed Plan to achieve sustainable economic growth by allocating new housing development opportunities in the right location

Taylor Wimpey UK Limited (1967): Concerns regarding the content of the Proposed LDP as it is not consistent with Scottish Planning Policy or the Strategic Development Plan (SESplan) in respect to housing matters.

The Proposed LDP does not allocate sufficient housing sites to provide for a generous land supply at any point in its lifespan.

J G Lang & Son (2175) & Linlathen Developments (2118): It is considered that FIFEplan will achieve neither of the objectives set out in Paragraph 10, based on the information available.

Stewart Milne Homes Ltd (2035): Fife Council has not identified enough land in its Local Development Plan Proposed Plan to meet Strategic Development Plan requirements.

Does not comply with SPP.

The scale of the shortfall in the five year housing land supply is significant and will not be resolved by the current Local Development Plan Proposed Plan or Supplementary Guidance.

To address this, the 8 sites removed By Fife Council Executive Committee should be re-
Gladman Developments Ltd (2770): Seeking to accelerate the rate of house-building through the revised policy framework and by providing for a continuous, five-year supply of effective housing-land is a strategy which Gladman supports. Similarly, the allocation of land to support anticipated housing need is welcomed. Whilst we welcome the commitment to ensuring a continuous five-year effective housing-land supply, we are concerned that the policies intended to monitor and manage this requirement are perhaps more onerous than those required by the regional and national plans to which FIFEplan is subservient.

Lynch Homes (3710), Avant Homes (3696) & Taylor Wimpey (3692): Paragraph 10 states that the revised policy framework in FIFEplan will help to ensure the provision of a continuous effective housing land supply and a consistent approach across Fife. The introduction of a policy mechanism to ensure a continuous effective housing land supply within the LDP is welcomed.

FIFEplan does not provide any detail or justification on how the housing land requirement has been determined for the period to 2026. There is no guidance from the SDPs to set a housing supply target by local authority area beyond 2024.

All references in FIFEplan Proposed Plan regarding the period to 2026 should be deleted and replaced with the period to 2024.

Concerns with regard to the lack of detailed information on the methodology adopted by the Council to determine Fife’s housing land requirement across the SDPs and HMAs.

Concerns over the lack of transparent evidence detailing any housing supply assumptions adopted by the Council.

Considers that FIFEplan Proposed Plan has failed to demonstrate whether the housing land requirement is met in full and a five year effective housing land supply is maintained at all times both requirement of TAYplan, SESplan and SPP.

Mr and Mrs Finlay (3873): Support the strategy set out in paragraph 10.

Dispute, however, that sufficient land is allocated in the LDP to support the anticipated housing need and demand in the period to 2026.

Dispute Figure 2.4. Little confidence that the effective supply will deliver the required number of units to meet the requirement.

It is submitted that the housing allocations in the St Andrews & East Fife Housing Market Area require to be re-considered and increased to accord with the terms of Scottish Planning Policy.

Lomond Group (3731): Question how Figure 2.4 has been calculated and the how the requirement has been calculated. Objector provides own calculations of the housing land requirement and supply.

There is no forecasted programming available for the new allocations proposed in FIFEplan; therefore it is not possible to assess Fife Council’s consideration of their 5
year supply.

It is therefore evident that FIFEplan does not allocate a generous supply of land sufficient to meet the requirement across the plan area, as is required by SPP. As such, additional sites should be released in order to maintain an effective 5 year supply of land for housing and to meet the full housing requirement to the end of the plan period.

LRH Enterprises (3859): Query Figure 2.4 and how the housing land supply has been calculated.

On the basis of the information and related programming set out within the Fife Housing Land Audit 2013 it seems apparent that a significant shortfall presently exists and will remain over the plan period and that FIFEplan will fail to deliver the SESplan housing requirement and therefore completely fail to accord with the underlying requirements of SESplan and the SPP.

The William Brown Trust (3887): It is noted that Fife Council aim to accelerate housebuilding rates and ensure that a ‘continuous’ effective housing land supply is maintained. This is not being achieved in the Kirkcaldy, Glenrothes and Central Fife Housing Market Area.

POLICY 2: HOMES

Affordable Housing

Kingdom Housing Association (1178), Montgomery Forgan Associates (1958): Request that Policy 2 – Homes within Fifeplan, be modified with regard to the proposed caveat allowing for justified development outwith settlement boundaries; specifically for affordable housing. These proposed modifications ensure that the issue of the ability and opportunity to deliver within settlements is addressed before the caveat is accepted, and that a tiered threshold approach is then followed.

P M Uprichard (2805): Affordable Housing – there is no specific policy for this requirement, only three paragraphs in Policy 2 – Homes. There should be robust provisions for this housing.

R Gilchrist (3064): Policies 2, 7 and 8 should be consistent in there wording.

Houses in Multiple Occupation

J Watchman (2521): The text about Houses in Multiple Occupation refers to an area where restrictions on HMOs are in place but fails to identify any such area(s). The explanatory text (page 196, paragraph 11) is inconsistent with Class 9 of the Use Classes Order.

Derek Scott Planning(361): The policy as worded refers to areas where restrictions on HMO’s are in place but it does not specify where or refer to any Supplementary Guidance within which these areas of restrictions are located.

The Policy should be amended to specify the areas to which it relates and an opportunity given to comment/object on these areas and the restrictions in existence.
It is unacceptable that Fife Council should disregard the statutory definition and create a threshold of 3 people rather than 5 in respect of dwelling houses.

The first Part of Paragraph 11 should, as a result of the above be changed to the following:

'A house or flat can be termed a house in multiple occupation (HMO) if it is the principal residence of five or more unrelated people.'

Care Accommodation

Lomond Group (3733): The commitment to maintenance of a 5 year effective supply of housing land is welcomed and supported.

The affordable housing section is welcomed and supported.

The policy provisions for care homes do not extend as far as those for affordable housing and no specific provision is made for the approval of care home or retirement homes on unallocated sites or sites outwith settlement boundaries in the event of an undersupply. In this regard, the plan is lacking.

Flexibility is needed so that appropriate developments can come forward in sustainable locations in the absence of available or suitable sites within a settlement boundary or allocated sites.

The first sentence of the second paragraph of the ‘Care Homes’ section of Policy 2 should be reworded to read:

“Such provision, covering both new development and change of use, should be in or adjacent to existing predominantly residential areas, within or adjacent to settlement boundaries.”

McCarthy & Stone Retirement Lifestyles Ltd (1954): Consider that the scope of Policy 2: Housing is too narrow and the policy would benefit from a more 'holistic' approach to meeting the housing needs of the elderly.

Request the wording of Policy 2: Housing is amended to better reflect this. We would recommend replacing the term 'Care Home' with 'Older Person's Accommodation'.

The revised Scottish Planning Policy stipulates that 'Where permission is sought for specialist housing, as described in paragraphs 132-134, a contribution to affordable housing may not always be required.' On this basis we would encourage the Council to consider not seeking affordable housing contributions from specialist accommodation for the elderly to encourage development of this nature to come forward.

Figure 2.1 – Sequential test

Alfred Stewart Property Foundation Ltd (1949): Object to the attempt to impose a sequential test (Figure 2.1) to support for housing proposals on land not allocated for such development but resultant of the need to maintain a five year housing land supply.

This matter is dealt with in full by SESPlan Policy 7.
TMS Planning Ltd (1910): Object to the attempt to impose a sequential test (Figure 2.1) to support for housing proposals on land not allocated for such development. Unreasonable to have any developer demonstrate why sites are not able to be developed.

If sites are not coming forward perhaps their effectiveness should be reassessed and their allocation reviewed through the LDP process.

Stirling Developments (2038 & 3682): In respect of a shortfall in the 5-year effective housing land supply, insert after the words ‘housing proposals will’, the word ‘only’ in terms of support, where they meet the sequential test for housing as shown in figure 2.1.

Taylor Wimpey UK Limited (1942), Beebe Land Ltd (3895): The sequential test in Figure 2.1 is not necessary and nor is it logical.

Paragraph 33 of SPP should be the basis of Policy 2 in respect to housing land supply. The first test in Figure 2.1 is not correct as SESplan treats the area as one HMA. In our view, therefore, Fife (SESplan) should be considered as a single area within the SESplan HMA.

The 2nd and 3rd tests of figure 2.1 are irrelevant and unnecessary. If there is a shortfall in the 5-year housing supply, it is of no significance if another allocated site could be developed. If such a site could be developed, then presumably it would form part of the effective supply, which has already been established to be deficient. That is why additional housing sites are required.

In our view, the Proposed LDP’s approach to dealing with housing proposals in the event of a housing supply shortfall can be simplified considerably, and brought into line with Scottish Planning Policy, by taking the following approach.

In Policy 2, in the section entitled ‘Housing Land Supply’, delete the final paragraph, which refers to the sequential test, and replace with the following text:

“Where there is a shortfall in the 5-year effective housing land supply, housing proposals will be supported on unallocated sites in appropriate locations in accordance with Scottish Planning Policy and the policies of this LDP”

Figure 2 should be deleted, and Policy 1, Part A, 2(a) should also be deleted. The text on page 195 of the Proposed LDP, in respect to ‘Applying Policy 2’, should be amended accordingly.

Housing Land Requirement

Stewart Milne Homes (1826), A & J Stephen (2165): Support mechanism to allow development of unallocated sites if a shortfall arises.

Stewart Milne Homes (1826), A & J Stephen (2165), King Group (1758), CWP (Tor Property Ltd) (1759), John Collier & Sons (1757), Persimmon Homes East Scotland (1841), Avant Homes (2032), Raith Developments Limited (1368), Taylor Wimpey plc (1725), Homes for Scotland (1838), Persimmon Homes (1987), Mark Richardson (1983), J.G.Lang & Son (2194), Gladman Developments Ltd (2751), Hallam Land Management Ltd (2993), The William Brown Trust (3890), Lynch Homes (3713), Avant Homes (3703),
Taylor Wimpey UK Limited (1942), Springfield Properties Plc (2026): Concerns over transparency of how housing land requirement and supply was calculated. It is not clear from the information provided in these sections of the Proposed Plan whether the Proposed Plan allocates sufficient land for housing, and further information should be provided to ensure accordance with the requirements of the SPP and the Strategic Development Plans.

Figure 2.4 does not appear to relate to SESplan and its Supplementary Guidance in a comprehensible manner. The housing supply figure in Figure 2.4 has not been supported by evidence to confirm the effectiveness and delivery of allocated housing sites described elsewhere in the Proposed Plan.

There is a significant shortfall in the amount of effective housing sites allocated, and an insufficient range of effective sites allocated to ensure that the housing supply target can be met across the FIFEplan area.

We believe the Proposed Plan, as currently drafted, will result in a shortfall of effective housing land which can only be resolved through the allocation of further sites. Supports the position adopted by Homes for Scotland in respect of housing land supply matters.

The Proposed LDP is, demonstrably, not consistent with SESplan and its Supplementary Guidance, or Scottish Planning Policy in respect to meeting housing land requirements and the need to maintain a 5-year housing land supply at all times.

Scottish Government (3204): Not clear how figure 2.4 was derived and if a generous supply of land has been allocated. Unclear whether Fife has an effective five year housing land supply.

Miscellaneous

Reforesting Scotland (97): Welcome the reference to rural huts as a form of holiday accommodation and supports the view that they aren't affordable housing as they do not provide permanent homes.

Townhill Community Council (629): Brownfield sites should be utilised before consideration is given to green field sites.

Release of land previously “not supported” for valid reasons, should have to be justified fully to local residents and in consultation with them.

Caravan Club (1693): Support approach set out in Policy 2 that seeks to provide a continuous 5 year land supply.

Support flexibility in the policy that when 5 year land supply is not met there is a process to bring other sites forward.

Support principle that sites within the settlement boundary should take priority over sites outside the settlement boundary.
Modifications sought by those submitting representations:

<table>
<thead>
<tr>
<th>STRATEGY - HOMES</th>
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<tbody>
<tr>
<td>Raith Developments Limited (1357), TMS Planning Ltd (1820), Alfred Stewart Property Foundation Ltd (1953 &amp; 3932), Taylor Wimpey UK Limited (1967), J G Lang &amp; Son (2175), Linlathen Developments (2118), Stewart Milne Homes Ltd (2035), Gladman Developments Ltd (2770), Lynch Homes (3710), Avant Homes (3696), Taylor Wimpey (3692), Lomond Group (3731), LRH Enterprises (3859), Mr and Mrs Finlay (3873): The housing land requirement should be re-visited and new site should be allocated to meet the shortfall.</td>
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<td>Persimmon Homes (1960): Sites should be reconsidered every two years via SPG.</td>
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<td>Affordable Housing</td>
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<tr>
<td>Kingdom Housing Association (1178), Montgomery Forgan Associates (1958): The following two modifications are recommended, replacing the current wording of the relevant paragraphs.</td>
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<tr>
<td>First Paragraph of Affordable Housing Policy</td>
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<tr>
<td>“The development of sites adjacent to settlement boundaries, excluding green belt areas, solely for the provision of affordable housing may be supported where there is established and unmet local need, and where no alternative opportunities are available and suitable for a viable affordable development within the settlement boundary. The scale of such adjacent development ought to reflect the character of the settlement – a maximum of 20 units for settlements with fewer than 200 households; a maximum of 30 units for settlements of between 200 and 1,000 households; and a maximum of 49 units for settlements of greater than 1,000 households.”</td>
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<tr>
<td>Supportive Paragraph 7</td>
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<tr>
<td>“Affordable housing proposals should be located within town and village boundaries as first choice, and brownfield opportunities should be explored. In cases where there is an established local need, and no such sites are available and suitable for a viable affordable development, then sites adjacent to settlement boundaries will be considered. Such sites will be for a scale of development which is appropriate to the setting and scale of the settlement. The proposal will require to conform to Fife Council’s Affordable Housing SPG in terms of tenure and type.”</td>
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<td>P M Uprichard (2805): There should be a specific Affordable Housing policy.</td>
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| Houses in Multiple Occupation |
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Derek Scott Planning (361): The first Part of Paragraph 11 should, as a result of the above be changed to the following:

'A house or flat can be termed a house in multiple occupation (HMO) if it is the principal residence of five or more unrelated people.'

Care Accommodation

Lomond Group (3733): The first sentence of the second paragraph of the ‘Care Homes’ section of Policy 2 should be reworded to read:

“Such provision, covering both new development and change of use, should be in or adjacent to existing predominantly residential areas, within or adjacent to settlement boundaries.”

McCarthy & Stone Retirement Lifestyles Ltd (1954): Request the wording of Policy 2: Housing is amended to better reflect this. We would recommend replacing the term 'Care Home' with 'Older Person's Accommodation'.

Figure 2.1 – Sequential test

Alfred Stewart Property Foundation Ltd (1949), TMS Planning Ltd (1910): Remove sequential test from (Figure 2.1)

Stirling Developments (2038 & 3682): In respect of a shortfall in the 5-year effective housing land supply, insert after the words ‘housing proposals will’, the word ‘only’ in terms of support, where they meet the sequential test for housing as shown in figure 2.1.

Taylor Wimpey UK Limited (1942): In Policy 2, in the section entitled ‘Housing Land Supply’, delete the final paragraph, which refers to the sequential test, and replace with the following text:

“Where there is a shortfall in the 5-year effective housing land supply, housing proposals will be supported on unallocated sites in appropriate locations in accordance with Scottish Planning Policy and the policies of this LDP”

Figure 2 should be deleted, and Policy 1, Part A, 2(a) should also be deleted. The text on page 195 of the Proposed LDP, in respect to ‘Applying Policy 2’, should be amended accordingly.

Housing Land Requirement

Stewart Milne Homes (1826), A & J Stephen (2165), King Group (1758), CWP (Tor Property Ltd) (1759), John Collier & Sons (1757), Persimmon Homes East Scotland (1841), Avant Homes (2032), Raith Developments Limited (1368), Taylor Wimpey plc (1725), Homes for Scotland (1838), Persimmon Homes (1987), Mark Richardson (1983), J G Lang & Son (2194), Gladman Developments Ltd (2751), Hallam Land Management Ltd (2993), The William Brown Trust (3890), Lynch Homes (3713), Avant Homes (3703), Taylor Wimpey UK Limited (1942), Springfield Properties Plc (2026): The housing land
requirement should be re-visited and new site should be allocated to meet the shortfall.

Summary of responses (including reasons) by planning authority:

**STRATEGY - HOMES**

Tina Chapman (4): Sites have been identified in the LDP that provide opportunities for brownfield development. While these cannot be relied on fully to meet the housing land requirement they will be promoted for development during the lifetime of the plan. Also developer requirements have been removed from many brownfield sites to make them more viable for development.

Scottish Natural Heritage (904): Comments noted

Raith Developments Limited (1357): The proposed amendments in the supporting paper to this representation are not accepted as they would require the identification of significant levels of additional housing when there was no need or benefit in pursuing this approach.

Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with in more detail in the Supporting Housing Paper.

Kirkcaldy North West has been considered in a previous plan examination and dismissed as a development option. The extent of any shortfall is not relevant to the discussion around this site as it is unsuitable for development.

CALA Management Ltd and W B Bayne & Son (2210 & 2212): Phasing for Cupar North and all other sites are included in the Housing Land Audit which is produced through discussion with developers. Therefore there is no need to change the phasing as it the best estimate available.

Miller Homes East Scotland Ltd (2110), Gladman Developments Ltd (2770): Comments noted

TMS Planning Ltd (1820), Alfred Stewart Property Foundation Ltd (1953 & 3932), Taylor Wimpey UK Limited (1967), J G Lang & Son (2175), Linlathen Developments (2118), Stewart Milne Homes Ltd (2035), Lynch Homes (3710), Avant Homes (3696), Taylor Wimpey (3692), Lomond Group (3731) & LRH Enterprises (3859): Issues relating to housing land supply and associated methodologies are covered under Policy 2: Homes below and the Supporting Housing Paper.

Persimmon Homes (1960): The strategy is led by the requirements of SESplan which directs growth to the Ore/Upper Leven Valley. Sites in this area have been promoted by developers as being effective through the call for sites exercise so to state that delivery has not been taken into account mis-represents the process that has taken place. Housing land allocations are best reviewed at Local Development Plan review cycles and monitored through the annual housing land audits. Infrastructure providers and the development industry could not respond to such time scales and such an approach would only lead to a bi annual debate about shortfalls rather than focussing energy on delivering housing.
The William Brown Trust (3887): Levels of housing completions in the Kirkcaldy Housing Market area have been in decline but this is due to the effects of the recession and not as a result of deficiencies in land supply. The area has however increased activity is expected with the progression of the two Strategic Development Areas in Kirkcaldy, the Levenmouth SDA and several sites around the Glenrothes and Markinch area. Therefore, it is appropriate to continue with the wording in the plan.

### POLICY 2: HOMES

#### Housing Land Requirement

Stewart Milne Homes (1826), A & J Stephen (2165), King Group (1758), CWP (Tor Property Ltd) (1759), John Collier & Sons (1757), Persimmon Homes East Scotland (1841), Avant Homes (2032 & 3703), Raith Developments Limited (1368), Taylor Wimpey plc (1725), Homes for Scotland (1838), Persimmon Homes (1987), Mark Richardson (1983), J G Lang & Son (2194), Gladman Developments Ltd (2751), Hallam Land Management Ltd (2993), The William Brown Trust (3890), Lynch Homes (3713), Taylor Wimpey UK Limited (1942), Springfield Properties Plc (2026), Scottish Government (3204): FIFEplan recognises that there are challenges facing the housing markets and the importance of addressing these issues for the benefit of the communities in Fife. FIFEplan looks to encourage the delivery of housing and, to this end seeks to reduce the burden on the developer through revised planning obligations and gives greater clarity when developer contributions are necessary.

#### Relationship to SPP 2014

FIFEplan was started in 2012 and by June 2014 was complete and in the Committee process. Revised Scottish Planning Policy was released in June 2014. Given that neither of the Strategic Development Plans on which FIFEplan is based relate to this National Policy document and the delays it would have brought to the LDP plan process to try to address the requirements of SPP, the housing strategy, policy and proposals of the FIFEplan Proposed Plan are based on Scottish Planning Policy 2010 due to the timing of its preparation.

#### Land supply in the TAYplan area

TAYplan sets challenging housing targets. FIFEplan includes enough land, through land allocations and allowances, to address these targets with some added flexibility.

#### Relationship to SESplan and TAYplan timescales

The Council uses housing market areas to identify more local requirements where none are specified in SESplan. The Council also extends the LDP period to 2026 in line with the requirements of Scottish Planning Policy (2010). SPP instructs the LDPs to provide land for housing for a period of 10 years from the expected date of adoption of the LDP, which is expected to be in 2016. These approaches do not conflict with SESplan or TAYplan.

#### Levels of new housing land identified through the LDP

The requirement set by through the SESplan Examination is not considered to be credible as it requires the delivery of a level of housing which cannot be achieved by the
housing markets. It includes a requirement that is at a level the development industry is unable to achieve irrespective of how much land is identified. Irrespective of the situation presented by SESplan the Local Development Plan has identified land for additional 9,035 additional houses in the SESplan area and these allocations, in addition to the established land supply and allowances for windfall development are numerically sufficient to meet the SESplan housing land requirement.

All solutions presented in the representations will make no impact on the ability to deliver the requirement as they all focus on a simple addition of more and more land. None of the responses provide any insight into the real challenges behind the non-delivery of housing and are simply aimed at getting large areas of housing land identified to reflect respective interests in land options or ownership without explaining why those locations are best placed or required to meet Fife’s development plan strategy.

Issues relating to housing land supply and associated methodologies are covered further in the Supporting Housing Paper.

Affordable Housing

Kingdom Housing Association (1178) & Montgomery Forgan Associates (1958): Comments noted. Fife Council considers that there is merit in some of the proposed changes put forward and proposes amending the policy to read and invites the Reporter to make an appropriate recommendation on this issue:

“Affordable Housing

The development of sites adjacent to settlement boundaries, excluding green belt areas, solely for the provision of small scale affordable housing, may be supported if no alternative site is available within a settlement boundary. In such instances, priority will be given to the redevelopment of brownfield sites. The scale of such adjacent development will reflect the character of the settlement – a maximum of 20 units for settlements with fewer than 200 households; a maximum of 30 units for settlements of between 200 and 1,000 households; and a maximum of 49 units for settlements of greater than 1,000 households.

Paragraph 7

Affordable housing proposals should be located within town and village boundaries as first choice and brownfield opportunities should be explored. In cases where there is an established local need and no sites are available within settlement boundaries, sites adjacent to settlements will be considered but only for affordable housing. Such sites will be for development of a limited scale appropriate to the setting and scale of the settlement and will require the affordable homes to be available for local need and continue to be affordable for that need. These will generally be single site developments which can be integrated with the town or village and not cause an unacceptable impact on local services or infrastructure. The proposal will require to conform to Fife Council’s Affordable Housing SPG in terms of tenure and type.”

P M Uprichard (2805): Policy 2 - Homes provides the policy basis for Affordable Housing with the Affordable Housing Supplementary Planning Guidance providing more detail to supplement this policy. All other issues relating to affordable housing such as design, scale and associated infrastructure are covered under Policy 1 and other supporting
R Gilchrist (3064): Comments noted

Mr and Mrs Finlay (3873): Support for strategy noted and welcomed. There is no conflict between the LDP strategy for the St Andrews area and SPP. The approach set out in the LDP conforms with that in TAYplan and over allocates housing to provide more opportunities in smaller settlements to complement the SDAs.

Houses in Multiple Occupation

J Watchman (2521), Derek Scott Planning(361): It is true that the Central St Andrews conservation area boundary is the area to which the moratorium applies. However the policy in FIFEplan covers the whole of Fife and it is more appropriate to not refer to individual areas where a moratorium applies. It may be that moratoriums are introduced in other towns or the St Andrews boundary is amended. To allow the flexibility for this to occur it is appropriate to put the town specific detail in the HMO supplementary guidance where it can be update more readily.

With the regard to the threshold of 3 people rather than 5 in respect of dwelling houses, this objector is confusing two separate issues, the planning legislation relating to flats and dwellings.

In terms of planning legislation flats are not houses, and therefore have no permitted development rights in terms of the number of unrelated people who can reside together. The legislation for houses is quite specific: up to and including 5 people may reside together without planning being required - though an HMO licence is required for 3 or more people.

Therefore while both houses and flats are effectively used for the same purpose- to live in, the legislation is different as it applies to them and therefore this has implications for the HMO legislation too. The rationale relating to flats is therefore based on the fact that the legislation which permits up to 5 people in houses does not apply to flats. When the legislation relating to the licencing of HMO was introduced about ten years ago, from a development management perspective, it made sense to align the number of people occupying a flat to be the same as the licencing for HMOs, hence 3 people or more. This is generally the same for most other planning authorities.

Care Accommodation

Lomond Group (3733), McCarthy & Stone Retirement Lifestyles Ltd (1954): Policy 2 sets out the policy framework for Care Home proposals to be tested against. Relevant organisations are to be consulted regarding Care Home provision as Fife Council seeks to ensure that there is a justified distribution of nursing and residential care provision based on assessed local health and social care needs throughout Fife. There is no need to change the title of this section of Policy 2 as Older Person’s Accommodation can be covered through the various sections of this policy.

The exemptions proposed would allow the principle of care homes in the countryside. This would promote an unwarranted breach in the development in the countryside policy in the absence of any proven need. This differs from the affordable housing where there is a specific need that is being addressed and small sites adjacent to settlement
boundaries are potentially suitable for affordable housing as a last resort. Should a need for care home be identified during the Plan period then the LDP is equipped through its policies to allow suitably sited and thought out proposals for care homes to gain planning permission.

Rob Thomson (1350): It is difficult to quantify the demand for care homes and there is no specific target to which the LDP can consider addressing. Therefore an individual category of allocation for care homes is not required. However if proposals come forward within settlement boundaries there is still a presumption in favour of development if it meets the remainder of the relevant policies in the plan. This would ensure that care homes, not identified in the LDP, could be favourably received.

**Figure 2.1 – Sequential test**

Alfred Stewart Property Foundation Ltd (1949), TMS Planning Ltd (1910), Taylor Wimpey UK Limited (1942), Beebe Land Ltd (3895): It is entirely appropriate to have the sequential test as set out in Figure 2.1 because, if there is a shortfall in the 5-year effective land supply, then development should be directed to sustainable locations consistent with the planning principles. Developers should provide evidence to justify why their site should come forward and Figure 2.1 provides a framework to do this.

It is not appropriate to simply remove the sequential test and direct all development to edge of centre locations. Also the wording proposed simply encourages the same outcomes as the sequential test, albeit in a weaker manner.

Reference to housing being supported in ‘appropriate locations’ is not as robust as the sequential test so the proposed change is not acceptable. The role of LDPs is to expand on the wording in SPP rather than simply reference SPP.

Stirling Developments (2038 & 3682): Comments noted. The text proposed in the representation would make it clearer that there were no exceptions to the rule when considering the acceptability of allowing development on unallocated sites. Fife Council considers that there is merit in the proposed change and invites the Reporter to make an appropriate recommendation on this issue.

**Miscellaneous**

Reforesting Scotland (97), Caravan Club (1693): Support noted.

Townhill Community Council (629): Where possible, when identifying locations for new housing and other uses, Fife Council considers the re-use of previously developed land before development on greenfield sites, in line with *Scottish Planning Policy (2014)*. In order to conform to TAYplan/SESplan Strategic Development Plan requirements, however, it has been necessary to include greenfield development sites in the Local Development Plan. Further, the provision of a mix of brownfield and greenfield sites is required to provide sufficient choice for the market to deliver the developments an area needs.

All candidate sites were consulted on through the Main Issues Report and Development Strategy consultations.
Reporter's conclusions:

STRATEGY - HOMES

Background

1. Many of the representations refer to a lack of background information on the council’s calculations in figure 2.4 of the proposed plan (Housing land requirements and supply by housing market) and to the absence of a housing topic paper. The council subsequently provided a Supporting Housing Paper and the 2015 Housing Land Audit (2015 HLA) as core documents. The Supporting Housing Paper updated the calculations in figure 2.4 of the proposed plan to take into account the 2015 HLA (see figure 5.2). Figure 2.4 found that there was an adequate housing supply in the period 2016-2026 to satisfy the housing requirement. In contrast, updated figure 5.2 identifies a significant shortfall for the same period if the outputs from the 2015 HLA are used.

2. In further information request FIR 03, I asked the council for clarification on a number of points with regard to the strategy, housing requirement figures and the Supporting Housing Paper. Parties then had the opportunity to respond to the council’s comments/calculations and provide any further comments on the Supporting Housing Paper or the 2015 HLA through further information request FIR 11.

3. As a consequence of parties’ responses to further information request FIR 11, a hearing session was held on 9 February 2016 on matters with regard to the housing calculations and to discuss the council’s agreement to the SESplan Housing Land Supplementary Guidance – 2014 (SESplan SG) figures, the influence of economic/market circumstances, the wording of Policy 2 – Homes and the options available to remedy any shortfall in housing land supply. Further information requests FIR 11b and FIR 3b were issued in order to further clarify the detailed housing figures.

4. Following discussions at the hearing session about an improving housing market, I then asked the council through further information request FIR 93 to reassess, in an improving housing market (where housing completion rates are the same in 2020 as they were pre-recession and in the years leading up to 2020 they increase steadily), the effectiveness of all of those sites currently identified as constrained due to market conditions only. In addition, I requested an estimate of the percentage of the unconstrained established supply currently programmed for beyond 2026 which could come forward within the plan period and before 2020. I asked the council to provide revised versions of various figures and tables in the proposed plan, Supporting Housing Paper, the 2015 HLA and previous responses to further information requests. Parties were then given the opportunity to comment on the council’s response.

5. I have taken on board all of the information received both before and during the examination process together with the discussions at the hearing session in finalising my findings below.
### Housing land requirement

**Use of existing housing stock and brownfield sites**

6. I agree that the optimum use of the existing housing stock and the conversion of other buildings to housing are an important element of providing sufficient housing in any area. I note the council’s intention (in their response to my further information request FIR 03) to look after existing council housing stock making sure it is fit for purpose and the use of “Empty homes officers” when dealing with privately owned empty homes. I also commend the initiative “Homes Again Project” which is operated by a partnership of 5 local authorities. In addition, Policy 6 (Town centres first) and Policy 8 (Houses in the countryside) support the conversion of existing buildings to housing in town centres and the countryside. However, local authorities must satisfy the housing land requirement set out in the strategic development plans for their area which includes the provision of “new” housing over and above the existing housing stock. The lack of sufficient brownfield sites often leads to the resultant allocation of housing sites on un-built land (greenfield land). This is the case in Fife. Given that control of the existing housing stock is dealt with primarily outside the planning process, I do not consider that the proposed plan requires amendment.

7. Similarly I acknowledge the clear national policy principle set out in Scottish Planning Policy “to consider the re-use or re-development of brownfield land before new development takes place on green field sites” (paragraph 40). The council has confirmed that, where possible, when identifying locations for new housing this policy principle has been adhered to. However, in order to satisfy the strategic development plan housing land requirements it has been necessary to include various greenfield sites in the proposed plan, some of which are on agricultural land. Given the lack of sufficient alternative brownfield sites and the need to satisfy the housing land requirement figures, I find such an approach acceptable overall.

**Allowance for generosity**

8. The Fife housing land requirement is 31,641 for 2009-2026 (27,161 in the area covered by the SESplan strategic development plan - 2013 and 4,480 in the area covered by the TAYplan strategic development plan - 2012). Some parties have argued that the strategic development plan figures should be increased by 10 to 20% in order to reflect paragraph 116 of Scottish Planning Policy. This would increase the housing land requirement for Fife to between 34,805 and 37,969 (between 29,877 and 32,593 for the SESplan area and between 4,928 and 5,376 for the TAYplan area).

9. Paragraph 116 of Scottish Planning Policy states that the overall housing supply target should be increased by a margin of 10 to 20% to establish the housing land requirement in order to ensure that “a generous supply of land for housing is provided”. The SESplan SG which sets out the SESplan requirement figure of 27,161 was cleared by Ministers on 18 June 2014 and the revised Scottish Planning Policy was published on 23 June 2014. The council argues that the housing land requirement in the SESplan SG (24,570 for 2009-2024) is already 3.8% higher than the housing need and demand figure (23,660) derived from the SESplan Housing Need and Demand Assessment – 2011 (in order to make up for the shortfall in the City of Edinburgh).

10. I note that the unconstrained established housing land supply within and beyond the plan period of 26,400 plus completions gives a total housing capacity of 30,805
which is 13.4% over the SESplan requirement figure. There is, in addition, a further 3,612 units identified by the council as constrained due to marketing constraints only. There is no “policy” constraint to prevent any of the unconstrained established supply identified beyond the plan period, or additional sites identified as constrained due to marketing constraints only, coming forward within the plan period. I also acknowledge the view expressed by Homes for Scotland that there is such a gulf between what SESplan says is required and what the council believe can be delivered that the reporter may question the merit of adding a generosity requirement and exacerbating the already significant shortfall. Given the above, I am not convinced that there is any need or justification to add a further allowance for generosity to the SESplan housing land requirement figure of 27,161.

11. Turning to the TAYplan area, the total housing supply identified by the council is already 7.8% above the requirement figure of 4,480 (9.6% over the plan period 2016-2026). The unconstrained established housing land supply within and beyond the plan period of 5,287 plus completions gives a total capacity of 5,793 which is 29.3% over the TAYplan requirement figure. In addition, there are a further 561 units identified by the council as constrained due to marketing constraints only. There is no “policy” constraint to prevent any of the unconstrained established supply identified beyond the plan period, or additional sites identified as constrained due to marketing constraints only, coming forward within the plan period. I, therefore, consider that a generous supply of housing has already been provided in line with Scottish Planning Policy and that there is no need or justification for any increase to the TAYplan housing land requirement figure of 4,480.

Use of Housing Market Areas (HMAs)

12. The Fife Structure Plan 2006-2026 (May 2009) divided Fife into 4 HMAs on the basis of research and this has been reflected in the proposed plan and subsequent housing land audits. TAYplan is consistent with this approach and identifies both the St Andrews and East Fife HMA and the Cupar and North West Fife HMA. SESplan does not directly refer to the Dunfermline and West Fife HMA or the Kirkcaldy, Glenrothes and Central Fife HMA. Nevertheless, paragraph 3.5 of the SESplan SG Housing Land Technical Note - 2013 acknowledges that although the SESplan Housing Need and Demand Assessment considered the SESplan area as one functional HMA, there may be sub areas operating within it. At that time it was not considered practical to conduct research into the extent or workings of internal HMAs and the decision was taken that for strategic planning, the entire SESplan area should be treated as a single functional HMA. SESplan does not contain any guidance advising against the identification of such sub-areas at a local authority level.

13. Paragraph 111 of Scottish Planning Policy states that local authorities should identify functional HMAs i.e. geographical areas where the demand for housing is relatively self-contained and paragraph 110 encourages the identification of a generous supply of land for each HMA within a plan area. Taking all of the above into account, I consider the council’s identification of HMAs and the assignment of individual housing requirements to each HMA to be appropriate, in order to reflect the characteristics of more local housing markets.

14. The Fife Structure Plan used a 13/28 and 15/28 split when allocating the housing requirement to the Dunfermline and West Fife HMA and the Kirkcaldy, Glenrothes and Central Fife HMAs respectively. In the 2015 HLA, the council instead splits the overall
housing land requirement in the ratios of 2/3 and 1/3. Many parties disagree with this change regarding it as an arbitrary split for which there is no basis in SESplan and one which places too much emphasis on the Dunfermline and West Fife area where there is considered to be a lack of infrastructure. The council responds that recent completion figures show the markets in the Dunfermline and West Fife HMA to be much stronger than in the Kirkcaldy, Glenrothes and Central Fife HMA. In order to deliver the optimum amount of housing, the council is seeking to concentrate development in the HMA where the market is at present the most buoyant.

15. I note from figure 2.1 of the 2015 HLA that housing completions in the Kirkcaldy, Glenrothes and Central Fife HMA have fallen by 78% over the period 2006 to 2015 while over the same period completions have fallen by a much smaller 31% in the Dunfermline and West Fife HMA. The difference in the number of completions between the 2 HMA’s in the period 2006/2007 was 48 whereas in the period 2014/2015 there were 348 more completions in the Dunfermline and West Fife HMA. At the hearing session there was an acceptance from some, of a stronger market in the Dunfermline area and I agree that from the submitted evidence this would appear to be the case.

16. Elsewhere under this issue parties from the home building industry argue that additional housing land should be allocated in areas where the market is strongest and that in order to be effective, a site must be marketable. Given the changes in market circumstances since the Fife Structure Plan splits were used and the agreement of both the council and the home building industry that the priority is to ensure that housing is delivered on the ground, I find the adoption of a higher ratio for housing development in the Dunfermline and West Fife HMA, where the market is currently stronger, to be both logical and appropriate. I do not accept that such an approach would constrain housing development as it directs development to the area where it is most likely to be delivered. The lack of any guidance for such a split at a strategic level in SESplan does not prevent its adoption to reflect local circumstances.

Timeframe and calculations for 2024 to 2026

17. Some representations consider that the timeframe of the proposed plan should end at 2024 and that an indication of the housing land requirement/supply for the 7 year and 12 year periods and a rolling 5-year effective land supply for every period from 2015 to 2026 should be provided. Paragraph 119 of Scottish Planning Policy states that “Local development plans in city regions should allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times.”

18. The expected year of adoption for this plan was 2016 and I therefore agree that the adoption of a timeframe before 2026 would not be appropriate regardless of the time frames of SESplan and TAYplan. Following discussions at the hearing session, I also accept that given paragraph 119 of Scottish Planning Policy, the identification of housing land requirements/supply for the 7 year and 12 year periods are not necessary. After the hearing session, the council provided details of the rolling 5-year effective land supply from 2015 to 2026 and parties submitted various questions and comments when responding to this new information (further information request FIR 3b). Regardless of the accuracy of the council’s figures, I am not persuaded that the addition to the proposed plan of what would be an ever changing situation is required or appropriate. In
any case these figures do not alter my conclusions below with regard to the effective supply.

19. Finally some parties have queried the method used by the council to calculate the SESplan housing requirement for the years 2024 to 2026 which does not take into account the SESplan method of distributing some of the Edinburgh need and demand to surrounding authorities. It is also argued that no account has been taken of the overall accumulated shortfall. The 2,591 figure used by the council has been calculated by annualising the 10,363 figure for 2024-2032 taken from the SESplan Housing Need and Demand Assessment – 2011 (HNDA). No alternative figure for this period is included in either the more recent SESplan SG or the associated Housing Land Technical Note and no guidance is available on how the figures for 2024-2026 should be extrapolated.

20. I share the opinion of Homes for Scotland that the HNDA provides an appropriate basis of evidence from which to plan for housing need over this period. This approach does not include an allowance for the shortfall in the City of Edinburgh referred to in paragraph 3.5 of the SESplan SG but accords with the approach of many of the other local development plans prepared in the SESplan area (for example Scottish Borders). I note that this is inconsistent with the calculation method proposed by the City of Edinburgh in their examination. The report for that examination has recently been issued and the reporter concludes that “whilst neither view is necessarily wrong, I am content that the council’s more conservative estimate is applied.”

21. I accept the reasoning in the Edinburgh report of examination that the main objective of including this longer time period is to maintain the continuity of the land supply and that housing land supply projections become increasingly unreliable towards the end of any plan period. I also acknowledge that SESplan, the HNDA and both of these local development plans should have been reviewed before 2024. This provides the opportunity to reassess the figures for the period 2024-2026 against updated evidence, including the accumulated shortfall, if necessary. I am, therefore, satisfied that “whilst neither view is necessarily wrong”, the council’s method of calculation for the end of the plan period is, at this time, appropriate. I agree that an explicit explanation of how the 2024-2026 figure for the SESplan area has been derived should be added to the plan (as a footnote to new figures 2.4A and B).

Effective supply and shortfall/surplus

Calculations

22. The updated figures provided by the council in further information request FIR 11b show an effective supply as at 2015 of 18,803. The 2015 HLA has been agreed with Homes for Scotland with only 4 sites (175 dwellings) in dispute. The council’s response to further information request FIR 03 responds to the disputed sites stating that one has planning permission and agreeing to move the programming of the other 3 sites, which do not have planning permission, from 2016/17 to 2017/18, 2018/2019 or 2019/2020. According to the council, there is nothing in Planning Advice Note 2/2010: Affordable Housing and Housing Land Audits which would constrain these sites and there is no known impediment to them coming forward for development. While some parties do not concur with the detailed figures within the 2015 HLA, given the agreement of Homes for Scotland to the majority of its content, I accept that this up to date assessment of the housing land supply situation in Fife should be used in the examination rather than the out dated information in the 2013 HLA (subject to any changes as a result of my further
23. According to the updated figures supplied by the council, when added to completions (4,805), windfall (1,870), small sites (656), an allowance for 15% of constrained sites coming forward (736) and removing demolitions (789), this gives a total supply of 26,081. This results in a total shortfall in the period 2009-2026 of 5,559, Fife-wide (shortfall of 7,043 in the period 2009-2019 and a surplus of 1,484 in the period 2019-2026). This Fife-wide shortfall is made up of a 5,910 shortfall in the SESplan area and a 351 surplus in the TAYplan area.

24. I have assessed the calculations included in the council’s Supporting Housing Paper and subsequent FIR responses and the alternative methods of calculation suggested by other parties. I note that while many parties disagree on the detail of how the council figures are calculated and the extent of the shortfall, all agree that there is a shortfall of “at least” 5,910 in the SESplan area.

25. In the TAYplan area, the council’s figures show a surplus of 351. Even removing the 3 sites for 120 houses disputed by Homes for Scotland in the 2015 HLA, there is still a surplus of 231. Some parties dispute the effectiveness of some of the TAYplan sites included in the 2015 HLA while others contend that sites currently regarded as non-effective are in fact effective. However, as noted above, given the agreement of Homes for Scotland to the majority of sites, I am satisfied that the use of the 2015 HLA is appropriate. I also note that Homes for Scotland consulted its members and according to the text of the 2015 HLA, where necessary, a telephone survey was undertaken of developers not affiliated to Homes for Scotland. I am aware that some home builders contend they had no involvement in the preparation of the 2015 HLA but I am not convinced that this is a reason to disregard the validity of the HLA as a whole.

26. Other parties argue against the assumptions made in the council’s figures for windfalls, small sites, demolitions and 15% of those sites constrained due to marketing coming forward. However, paragraph 117 of Scottish Planning Policy states that the housing land requirement can be met from a number of sources including in some cases a proportion of windfall development. The windfall allowances are assumed at an annual average of 140 in line with the SESplan SG Housing Land Technical Note (table 3.4). The contribution from small sites (less than 5 dwellings) is recognised in PAN 2/2010 (paragraph 61). The figures used reflect the 50 per annum TAYplan allowance. The council’s Supporting Housing Paper refers to the conclusion of 3 programmes of major demolition and replacement. I regard the consequent 20 demolitions per annum figure (as in the SESplan SG Housing Land Technical Note - table 3.4) to be a reasonable assumption. I find the 15% used in relation to those sites constrained by marketing only, to be a very moderate figure particularly if, as predicted by many at the hearing session, the housing market is improving (15% of the 4,909 figure from my further information request, FIR 3).

27. Given the uncertainties expressed below about the level of the shortfall in general and following clarification through my various further information requests, I am satisfied that the use of the updated council figures (in further information request FIR 11b) for both the SESplan and TAYplan areas would be appropriate for the purposes of this local development plan. Figure 2.4 should be updated accordingly. For clarity, 2 separate tables for the periods 2009-2026 and 2016-2026 should be provided.
Shortfall and further information request FIR 93

28. I have noted the council’s argument that the reasons for the shortfall are the initial level of the requirement and the backlog due to the recession with the delivery of housing more than halved since 2007/2008. Furthermore, that the council has already identified sufficient new allocations over the plan period (land for an additional 9,035 houses in the SESplan area) and that identifying any more is a fruitless exercise as the market would not be able to deliver the required numbers of completions which would have to be considerably higher than were achieved even at the height of the market boom. The council does not consider that adding new sites through examination or requiring the council to add new sites would improve housing delivery and has drawn my attention to the fact that although the established land supply has been more than trebled since 2007, completions have more than halved. At current build rates, the unconstrained land supply in Fife equates to 39 year’s supply. Any additional sites would either compete with and slow the delivery of existing sites or remain inactive. The housing requirement for the SESplan area is considered to be inherently unrealistic and unachievable and the allocation of further sites could undermine the confidence of the local community in the planning process. The reduced assessment of need and demand in the SESplan2 Main Issues Report – 2015 is also referred to.

29. In contrast other parties contend that there is capacity to deliver further housing on alternative, more marketable, sites and that in any case, despite the agreement of Homes for Scotland to the majority of the 2015 Housing Land Audit, many of the sites currently regarded as effective, particularly the larger strategic sites, are non-effective and will not deliver within the plan period. Alternative, effective, sites should be allocated. The council has agreed to an increased housing requirement as a result of accepting a proportion of Edinburgh’s housing need and demand when preparing SESplan and to now claim that it is undeliverable lacks credibility. Community confidence in the planning system is more likely to be undermined by the continual allocation of housing land which has no reasonable prospect of being delivered or housing coming through the “back door” at appeal. The SESplan housing requirement figures must be adhered to.

30. I can understand the council’s wariness to accept that the high levels of completions necessary to satisfy the SESplan housing requirements will take place in the near future. However, the figures in SESplan were prepared in the knowledge that a very significant increase in the rate of house completions across the SESplan area would be needed if the housing requirements set out were to be met and that this would be challenging and particularly so in the period 2009-2019 (paragraph 3.14). I am satisfied that the proposed plan must be consistent with the currently approved SESplan and its supplementary guidance given the early stage which the preparation of SESplan 2 has reached.

31. Looking at the council’s figures in detail, I am aware that 4909 units of the constrained supply are, according to the council’s assessment, constrained due to marketing only (4,249 in the SESplan area and 660 in the TAYplan area). I recognise that these figures have not been agreed by Homes for Scotland and that there are disputes with the council about whether the only constraint to the effectiveness of some of these constrained sites is “marketing”. Nevertheless, the vast majority are smaller sites (under 150) which many of the home building industry at the hearing session regarded as more likely to come forward in the shorter term. Most are identified as “housing opportunity” sites in the proposed plan, some have planning permission and
some of the landowners have made representations disagreeing with the council's assessment that their sites are non-effective. Fife also has an established housing land supply of approximately 37,584 (31,687 unconstrained) stretching beyond 2026. I have noted this in the context of paragraph 119 of Scottish Planning Policy which states that local development plans in city regions should allocate a range of sites which are effective “or expected to become effective in the plan period” to meet the housing land requirement of the strategic development plan.

32. At the hearing session, the council confirmed that the constrained sites due to marketing were assessed in the market conditions prevalent at the time the 2015 HLA was prepared. Other parties including Homes for Scotland were optimistic at the hearing session about improvements in the housing market in the near future, and certainly within the plan period, arguing this as one of the justifications for the allocation of additional alternative housing sites. I also acknowledge the “ambition” in the Homes for Scotland manifesto to return to pre-recession building levels by 2020 while acknowledging that a wide range of actions is required in order to allow these pre-recession rates to be achieved.

33. Following the hearing session discussions, I issued further information request FIR 93 as described at paragraph 4 above. In response, the council reassessed the sites currently listed as constrained due to market conditions only and reaffirmed that, in their opinion, they all currently remain non-effective. The council concedes that it is theoretically possible that some of these sites could become effective as the only impediment to their delivery could be removed by a stronger market. However, it is not considered possible to quantify how many of these sites would come forward. The council regards this as an entirely hypothetical exercise as the impact of this level of market recovery is hard to quantify.

34. Similarly, the council, while acknowledging that in a more buoyant market, land could be delivered faster than currently programmed in the HLA, states in its response that it is not possible to predict on a site by site basis the impact of a more buoyant market on what percentage of the unconstrained established supply currently programmed for beyond 2026 could come forward within the plan period. It is argued that in the SESplan area, the capacity of the home building industry to deliver and the actual demand for housing would make such a situation entirely hypothetical and unachievable in reality.

35. As part of further information request FIR 93 I asked the council to produce revised versions of figure 2.4 of the proposed plan (figure 5.2 of the council’s Supporting Housing Paper) and Annex 1 of further information request FIR 03 to include the following:
   
   - all of those sites currently listed as constrained due to market conditions only in FIR 03 and
   - 15% of the unconstrained established supply currently programmed for beyond the plan period (beyond 2026) with 5% coming forward before 2020.

The revised figures for the period 2009-2026 show a surplus of 548 Fife-wide (shortfall of 658 in the SESplan area and surplus of 1,200 in the TAYplan area). The council declined to update the 2015 HLA tables as I requested, arguing that it would run counter to the annual methodology used and that resources are allocated to this task on an annual basis.
36. In response to further information request FIR 93, other parties including Homes for Scotland agree with the council’s position that it is not possible to quantify how many sites currently listed as constrained due to marketability only, or from the unconstrained established supply beyond the plan period, would come forward if delivery did return to pre-recession levels by 2020. Homes for Scotland considers that such programming would present a hypothetical scenario. However, the council’s assertion that the home building industry lacks the capacity to deliver at increased levels, and in particular the capacity to deliver the high levels of housing required by SESplan, is not accepted. The belief that the housing market is considered to be improving is re-confirmed. It is argued that additional land should be allocated in areas where the market is strongest.

Conclusion

37. Scottish Planning Policy is clear; local development plans should meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption (paragraph 119). Regardless of the backlog due to the slow-down in housing delivery during the earlier years of both SESplan and TAYplan and the doubts with regard to how the completion rates required will be achieved, the local development plan must identify sufficient housing land to meet the current strategic requirements until the existing strategic development plans are reviewed. According to the figures provided by the council, FIFEplan has not achieved this.

38. I have serious concerns about the realism of rejecting housing sites (for almost 5,000 units) as ineffective just because of current market conditions especially when other parties from the home building industry, including Homes for Scotland, consider that market conditions are improving. Furthermore, I am aware of the large unconstrained established supply currently programmed for beyond the plan period (over 10,000), some of which could come forward sooner in a more buoyant market. I have doubts about the council’s and other parties’ insistence that all of this potential additional supply should not be included in the housing supply calculations (apart from a 15% allowance for those sites constrained by marketing).

39. However, despite my reservations, as a consequence of the response of the council and other parties to FIR 93, I must find that there is a housing shortfall of 5,559 Fife-wide over the plan period, with a shortfall of 5,910 in the SESplan area and a surplus of 351 in the TAYplan area. The 2015 HLA shows a shortfall in the 5-year effective housing land supply for the SESplan area of over 7,000 (-5151 in the Dunfermline and West Fife HMA and -1,941 in the Kirkcaldy, Glenrothes and Central Fife HMA). There is a 5-year effective land supply in both the St Andrews and North East Fife HMA (+277) and in the Cupar and North West Fife HMA (+192) of TAYplan.

40. Some parties request that reference to the 5-year effective land supply figures should be included in the proposed plan. However, these figures will change from year to year and are more appropriately dealt with in the annual HLA. The preparation of the HLA should be referred to in the supporting text of this section to ensure adequate cross-referencing.

41. I therefore conclude that, given the housing shortfall in the SESplan area of Fife identified above, the proposed plan is not consistent with SESplan and the requirements of Scottish Planning Policy. This deficiency is not capable of being resolved through the examination process, due to a combination of the council and other parties’ responses to FIR 93 and the lack of appropriate new housing allocations. My uncertainty with regard
to the level of this shortfall should, however, be noted. There are a large number of housing units which could become effective over the plan period, if, as predicted, the housing market continues to improve. These include units from both those sites identified by the council as constrained due to marketing only and from the unconstrained established housing supply programmed beyond the plan period.

Options available to remedy the shortfall

42. Circular 6/2013 – Development Planning states that “In limited, exceptional circumstances, the reporter may identify a serious policy omission or deficiency in the plan, such as inconsistency with the National Planning Framework or Scottish Planning Policy. If this deficiency is not capable of being resolved through the examination process due to a lack of sufficient information, or if the information required could not be provided within the normal timescale for an examination the reporter will highlight the deficiency in the examination report. In such circumstances the reporter will provide recommendation(s) on actions that could be taken to remedy the deficiency such as recommending that an early review of the plan be carried out, or the preparation of statutory Supplementary Guidance. Ministers have powers in section 20 to prevent a plan being adopted (or in the case of an SDP to reject a plan under section 13) and in circumstances where a plan has a serious deficiency may exercise those powers. Where such a serious deficiency was identified, until such time as the deficiency had been resolved, the level of certainty normally provided by a development plan may be greatly reduced, leading to more planning applications for development contrary to the plan and, perhaps, more planning appeals” (paragraphs 122 and 123).

43. The following options to address a shortfall deficiency have been discussed through further information request FIR 11 and at the hearing session:

- Focus on bringing forward existing supply
- Allocate new sites through the examination in specific settlements/HMAs
- Allocate new sites through the examination Fife-wide
- Preparation of supplementary guidance by the council
- Early review of FIFEPlan, with a policy response until then

44. By far the most favoured approach from the home building industry, is to allocate new, more effective, housing sites in marketable locations through the examination. The development of a traffic light system similar to that used in Aberdeenshire is referred to. The council argues that instead there should be a focus on the delivery of existing housing sites and the methods required to overcome any constraints to their delivery.

45. I agree that focussing on bringing forward the existing supply both constrained and unconstrained should be an important element in meeting the housing land requirement. Text should be added to the proposed plan reflecting the importance of both the council and the home building industry working together to ensure that the established housing land supply is delivered and that marketing/other constraints can be overcome where possible. However, given that a shortfall has been identified, this can only be one element in the solution.

46. The council has agreed under Issue 3a (Strategy) to look at the use of a traffic light system as part of the application of the action programme. I do not consider the application of a traffic light system to be essential in order to ensure the efficient delivery
of housing sites. The council and home building industry working together closely to ensure delivery through the housing land audit process and the implementation of the local development plan should achieve the same goal. In any event, the preparation/application of the action programme is outside my remit. No modification to the proposed plan is required as a result.

47. With regard to the allocation of new housing sites, Scottish Planning Policy states that where a shortfall in the 5-year effective housing land supply emerges, development plan policies for the supply of housing land will not be considered up-to-date (paragraph 125). Paragraph 33 states that where relevant policies in a development plan are out-of-date then the presumption in favour of development that contributes to sustainable development will be a significant consideration. However, it goes on to say that decision-makers should also take into account any adverse impacts which would significantly and demonstrably outweigh the benefits when assessed against the wider policies in Scottish Planning Policy. The blanket allocation of candidate housing sites, just because there is a shortfall, would not therefore be appropriate.

48. I also consider it important that new sites are allocated in the HMA where the relevant shortfall in the 5-year effective housing land supply exists (see paragraph 13 above). I do not regard this as an inflexible approach. Scottish Planning Policy directs that a generous supply of land “for each housing market area” should be identified. Additional housing sites should therefore be located in the HMA’s where the demand for housing is not being met and there is a shortfall in the 5-year supply. Allocations in other HMA’s would not address this shortfall.

49. We have assessed all of the candidate housing sites promoted through this examination and recommend elsewhere in this report that various sites should be added to/deleted from the proposed plan or that the number of housing units should be varied. Where these changes impact on the housing supply figures in the 2015 Housing Land Audit, I have listed them below:

<table>
<thead>
<tr>
<th>Issue</th>
<th>Site</th>
<th>Comment</th>
<th>SDP area</th>
<th>Addition to housing supply in 2015 HLA</th>
</tr>
</thead>
<tbody>
<tr>
<td>4</td>
<td>Kincardine Eastern Expansion Phases 1 and 2</td>
<td>Additional sites</td>
<td>SESplan</td>
<td>+140</td>
</tr>
<tr>
<td>4</td>
<td>Spencerfield, Inverkeithing</td>
<td>Additional site</td>
<td>SESplan</td>
<td>+295</td>
</tr>
<tr>
<td>9</td>
<td>Land at Wester Aberdour</td>
<td>Additional site</td>
<td>SESplan</td>
<td>+20</td>
</tr>
<tr>
<td>12</td>
<td>MAR 001 Markinch South</td>
<td>Capacity increased from 200 to 300 (350 in proposed plan)</td>
<td>SESplan</td>
<td>+100</td>
</tr>
<tr>
<td>15a</td>
<td>COB 001 Colinsburgh SE</td>
<td>Capacity increased from 40 to 43</td>
<td>TAYplan</td>
<td>+3</td>
</tr>
<tr>
<td>16</td>
<td>Northbank Farm, Cameron</td>
<td>Additional site</td>
<td>TAYplan</td>
<td>+15</td>
</tr>
<tr>
<td>17</td>
<td>Land at Baltilly, Ceres</td>
<td>Additional site</td>
<td>TAYplan</td>
<td>+19</td>
</tr>
<tr>
<td>18</td>
<td>Bellfield, Strathmiglo</td>
<td>Additional site</td>
<td>TAYplan</td>
<td>+5</td>
</tr>
<tr>
<td></td>
<td>TOTAL</td>
<td></td>
<td></td>
<td>+597</td>
</tr>
</tbody>
</table>
50. The new versions of figure 2.4 which I recommend for inclusion in the proposed plan do not take into account these changes to the housing supply. The council should amend the figures accordingly before including the figures in the plan. It is clear, however, that the additions to the supply would still not be sufficient to meet the shortfall identified above. I must therefore turn to the 2 remaining options.

51. First, the preparation of supplementary guidance by the council. There is little support from parties for this option citing the time and resources that would be taken to prepare it, the delay in addressing the shortfall in the short term, the lack of independent scrutiny and the unfair ability of the council to reject housing sites without good reason.

52. Second, the early review of the local development plan with a policy response until then. Again there is little support for this option and many of the same arguments are advanced, in particular the time which would be involved and the likely delays in satisfying the shortfall which would result. A policy response to the shortfall is supported by some including Homes for Scotland.

53. Comparing these 2 options, I consider that the time and effort which would be taken in preparing supplementary guidance would be better applied to the early review of the local development plan. This would provide the opportunity for any additional sites to be independently assessed and follow a more rigorous consultation process. SESplan2 is expected to be approved in 2018 and the review would be able to take on board any resultant changes to the housing land requirements. In the meantime a version of Policy 2 (Homes) can be applied to housing proposals where a shortfall in the 5-year effective housing land supply is shown to exist in the relevant HMA (see paragraphs 56 to 62 below). Housing proposals could therefore be considered in advance of the review process and appropriate sites developed without unreasonable delay.

<table>
<thead>
<tr>
<th>Issue</th>
<th>Site</th>
<th>Comment</th>
<th>SDP area</th>
<th>Reduction to housing supply in 2015 HLA</th>
</tr>
</thead>
<tbody>
<tr>
<td>7a(2)</td>
<td>DUN 038, Kent Street (Dunfermline)</td>
<td>Capacity reduced from 120 to 80</td>
<td>SESplan</td>
<td>-40</td>
</tr>
<tr>
<td>7a(2)</td>
<td>DUN 045, Rosegreen, Carnock Road (Dunfermline)</td>
<td>Site deleted</td>
<td>SESplan</td>
<td>-100</td>
</tr>
<tr>
<td>7a(2)</td>
<td>DUN 046, Chamberfield Road (Dunfermline)</td>
<td>Capacity reduced from 50 to 40</td>
<td>SESplan</td>
<td>-10</td>
</tr>
<tr>
<td>8</td>
<td>CRO 002, land west of Old Perth Road, Crossgates</td>
<td>Capacity reduced from 260 to 200</td>
<td>SESplan</td>
<td>-60</td>
</tr>
<tr>
<td>10</td>
<td>BUR 003, Land at Haugh Road, Burntisland</td>
<td>Capacity reduced from 40 to 20</td>
<td>SESplan</td>
<td>-20</td>
</tr>
<tr>
<td>14</td>
<td>WWS 001, Wemyss Estate Land at West Wemyss</td>
<td>Capacity reduced from 85 to 42 (54 in proposed plan)</td>
<td>SESplan</td>
<td>-43</td>
</tr>
<tr>
<td>17</td>
<td>CER 001, Doves Loan, Ceres</td>
<td>Site deleted</td>
<td>TAYplan</td>
<td>-12</td>
</tr>
<tr>
<td></td>
<td>TOTAL</td>
<td></td>
<td></td>
<td>-285</td>
</tr>
</tbody>
</table>
54. Finally, the lawfulness of following either of these options and adopting a local development plan which is not consistent with the strategic development plan has been questioned by several parties. However the possibility of such a scenario occurring has, as is demonstrated by paragraphs 122 and 123 of circular 6/2013 above, already been envisaged by Ministers. I am satisfied that it is within my remit to recommend such an approach and therefore conclude that the proposed plan should be amended to state that the review of this local development plan will be undertaken as quickly as possible to enable any remaining shortfall to be timeously addressed and to respond quickly to the requirements of SESplan2.

55. In the meantime, the next housing land audit should fully take into account anticipated improvements in the housing market and any new planning applications for housing should be assessed against the revised version of Policy 2 recommended below.

POLICY 2 HOMES

Figure 2.1 – sequential test

56. The first section of Policy 2 deals with housing land supply and refers to a “sequential test” for housing where there is a shortfall in the 5-year effective housing land supply. The sequential test is explained further in paragraph 4 of the supporting text and figure 2.1 of the proposed plan. Paragraph 4 states that prospective developers would have to satisfy the council that they have done the following:

- First, assessed sites within the established land supply that have stalled or have no current planning permission to see if these sites can be developed; then
- Assessed previously developed land/development opportunities; then
- If no opportunity to use previously developed (brownfield) development opportunities presents itself, assessed unallocated sites within settlement boundaries.

57. Figure 2.1 diagrammatically asks the following:

- Is there a housing shortfall in the relevant HMA?
- Can an allocated site be used?
- Is there a suitable unallocated site within a settlement?
- Is the proposal on an edge of settlement or countryside greenfield land release?

58. We had a lengthy discussion at the hearing session about how a “sequential test” would be implemented in practice. Following these discussions, I am not convinced that, in reality, such an approach would work when dealing with sites for housing. Despite the council’s attempted explanation, I am still unclear exactly how a prospective developer would satisfy the council’s requirements and am concerned about the scale and difficulty involved in one developer gaining access to private information from another developer about sites outwith their control, as well as the commercial sensitivity implications. Much of the information on stalled sites will not be publicly available. I regard the sequential approach proposed by the council as unacceptably difficult to implement and unduly onerous. Reference to this “sequential test” should be removed from the proposed plan.

59. Having taken into account all the various points made, I do, however, find that
additional policy guidance is required against which to assess new housing proposals when a shortfall in the 5-year effective housing land supply is shown to exist. I consider that a criteria based approach should be adopted, similar to Policy 7 in SESplan, although I do not agree that exactly the same criteria should be used. Instead these should be updated to reflect paragraph 33 of Scottish Planning Policy (the balance between any adverse impacts of the proposed development and the benefits of addressing any shortfall when assessed against wider policies) as well as the spatial strategy of SESplan, paragraph 3.11 of the SESplan supplementary guidance and Policy 5C (Housing) of TAYplan (complementing and not undermining the delivery of existing committed development). In addition, reference should be made to addressing both infrastructure constraints (as in Policy 7 of SESplan) and the capability to deliver completions in the next 5 years given the importance of ensuring that the site will help to maintain a 5-year housing land supply. Unlike the sequential test, these criteria would provide clear and unambiguous guidance for both prospective developers and the council against which to assess proposals for new housing sites which could contribute towards any housing shortfall, while still ensuring that locational criteria such as position within or outside a settlement boundary can be taken into account.

60. Figure 2.1 refers to a housing shortfall in the relevant HMA. Several representations object to this reference to HMA’s. However, for the reasons given in paragraphs 12 and 13 above, I consider the use of sub-areas at a local authority level to reflect the characteristics of more local housing markets to be appropriate. Elsewhere in this section, I have recommended the deletion of figure 2.1. The references to HMA’s should therefore be inserted in the revised version of Policy 2.

61. Finally, I agree with the council that the wording of the policy should make it clear that there are no exceptions to satisfying the criteria. However, I do not accept that the suggestion to add “only” before “supported” in the final paragraph of this section would be the best way of achieving this. Instead using the wording “subject to satisfying each of the following criteria” would both reflect the wording of Policy 7 of SESplan and achieve the same aim using a more positive form of wording.

62. I conclude that policy 2 and its supporting text should be amended as set out above and figure 2.1 deleted.

Changes to capacity of housing sites

63. The final sentence of the development requirements section advocates a policy approach where proposals to change the capacity of housing sites by more than 20% above or below the capacity shown in the plan will be treated as potentially contrary to the plan. In response to my further information request FIR 11 the council continues to support this part of the policy stating that the purpose of the local development plan procedure, particularly the Main Issues Report stage is to front load the planning process so that later in the development plan and development management process, the principle and basic premise of a proposal is agreed. The council regards it as reasonable to assume that those submitting housing sites have considered the capacity and that the numbers provided have a large degree of assessment behind them. While agreeing that there needs to be flexibility to allow for changes in capacity identified through masterplanning, it is argued that more than 20% flexibility would undermine the assessment and consideration of the scale of the site carried out at the earlier stages of plan preparation.
64. Others also support the approach with the exception of where a masterplan or similar document prepared post adoption justifies a higher density. It is argued that the approach has previously been used and allows the council to consider exceptional circumstances and potentially grant a departure, or for any significant over delivery to be promoted through a review of the local development plan.

65. Those opposing the approach consider that if an appropriately laid out and designed housing proposal delivers more than 20% above the proposed plan’s estimated capacity, this should not be used as a stand-alone reason to refuse development. Conversely if the detailed assessment carried out through the planning application process identifies a constraint not previously known this may justifiably reduce the capacity of a site. No work has been undertaken by the council to demonstrate that, in all cases, a 20% increase or decrease would result in significant, new unacceptable impacts. Additional administrative burdens would occur if this approach were applied and it could result in effective housing land not being brought forward in the short term. It is not until the development of a site is considered in detail that the numbers become clear and to artificially pre-empt the detailed planning process is considered inappropriate. Site capacity should be determined through the planning application and by place-making principles and market demand. Furthermore, applying a standard 20% introduces an element of proportional bias depending on the size of the site. Others argue that a difference of even 10% is sufficient to regard revised proposals as contrary to the proposed plan.

66. I note that the housing capacities identified in the proposed plan are “estimated capacities” which provides sufficient flexibility for site capacity amendments to be made at the planning application stage. The council has not provided any justification for the 20% figure proposed. There may be instances where a higher percentage increase/decrease would be justified and conversely there may be cases where a lower percentage increase/decrease would not be acceptable. Each housing site will have differing characteristics and the adoption of a blanket approach does not appear appropriate. I am not convinced that the adoption of an arbitrary percentage above or below which proposals would be considered contrary to the plan is justified.

67. I consider that the most appropriate place to determine the actual number of houses built on a site is on a case by case basis, through the planning application process, after all the developer requirements and the detailed impacts can be fully assessed. Any proposed changes to the estimated capacities could then be justified through other material considerations and site by site.

68. I conclude that the final sentence of the section on development requirements should be removed from the proposed plan.

Affordable housing

69. Representations suggest several modifications to the wording of the first paragraph on affordable homes while still accepting that development should firstly be directed to within settlement boundaries, that brownfield opportunities should be explored and the desirability of establishing an upper threshold for affordable developments outwith settlement boundaries. The deletion of reference to “small scale” and the “priority given to the redevelopment of brownfield sites” together with the addition of reference to “established and unmet local need” and “suitable viable affordable development within settlement boundaries” is suggested by representors in a revised first sentence.
70. The council sees merit in some of the changes suggested but prefers alternative wording in some instances. In response to my further information request FIR 2b the council provided clarification about why some of the suggested amendments were supported and not others. The council recommends the removal of reference to “unmet local need” and “suitable viable sites within settlement boundaries” from the suggested amended wording as this would make it too easy to go straight to the green field option. While the issues of need and viability will be considerations for the developer in taking forward a proposal the council does not want them to be enshrined in policy and used as a means of bypassing the brownfield option. The use of the word “ought” in the suggested final sentence is seen as being too weak as it is an essential requirement of all development to fit in with its surroundings. The council does see merit in the proposed threshold changes as this helps to keep the development in keeping with the character of the existing settlement size.

71. I agree with the council that reference to “viability” should not be included in the policy wording as a means of by-passing the suitability of sites for affordable housing within the settlement boundary. I am not convinced that the issue of the ability and opportunity to deliver within settlements needs to be referred to explicitly in the policy wording. I also consider that “small scale” should remain to reflect the size of development which will be considered appropriate outside settlements. The encouragement of brownfield development is an important element of national policy and I regard its prioritisation as an appropriate part of the policy approach. The council argues against reference to the requirement for an established and unmet local need. However, paragraph 7 of the supporting text for this policy already includes this identical wording. I do not agree that its inclusion in the policy wording would weaken the policy in any way and consider that if reference was made in the policy as well as the supporting text, this would instead strengthen the policy and give greater clarity.

72. The council accepts that a tiered threshold approach should be reflected in the policy rather than a set maximum of 30 houses whatever the size of the settlement. I agree that a “one size fits all” approach as currently proposed in the policy is neither appropriate nor practical. I concur that differing scales of new development should be applied to settlements with fewer than 200 households (20 units maximum), between 200 and 1,000 households (30 units maximum) and greater than 1,000 households (49 units maximum). This will reflect the character of the settlements and therefore I regard the use of “will” rather than “ought” to be preferable.

73. Amendments to the wording of supporting paragraph 7 are also put forward and again the council supports some and not others. I agree that the addition of reference to “brownfield opportunities being explored” in the first sentence would be consistent with the policy wording. For the reasons given above I do not accept that reference to “viability” should be included in the second sentence. Overall, I regard the existing wording of the third and fourth sentences to be useful in explaining that “limited scale” development will be appropriate, affordable homes should be available for local need and continue to be available for that need and that these will generally be single site developments which can be easily integrated without unacceptable impacts on infrastructure or services. The suggested deletions are not accepted. Finally, I consider that the suggested addition of wording to refer to the council’s affordable housing supplementary guidance on the matters of tenure and type would be helpful.

74. I note the assertion that there is no specific policy for affordable housing, the perceived associated failure to provide affordable housing in St Andrews, the lack of
enforcement/enforceability of the 30% requirement and the need for more robust provisions for this type of housing. However, no alternative policy wording is suggested in the representation. Subject to the changes suggested in the preceding paragraphs, I consider that the existing policy framework together with the associated supplementary guidance will provide a coherent and enforceable strategy for the provision of affordable housing. The inclusion of a section on affordable housing under a general policy heading of “Homes” rather than having a distinct policy on affordable homes does not lessen the importance of this sector of housing provision. The policy wording must still be implemented. Matters in relation to improving enforcement on the ground are outside my remit.

75. A representation refers to inconsistencies between the wording of Policy 8 (Houses in the Countryside) and Policy 2. These relate to what is meant by “small scale”, “edge of settlement”, “shortfall in local provision”, “no alternative site is available within a settlement boundary” and clarity in terms of how development should be integrated with the settlement.

76. In response to my further information request FIR 2b the council has now responded to the points made in the representation. The council argues that to repeat the text of Policy 2 in Policy 8 would be unnecessary duplication, refers to the proposed changes to Policy 2 clarifying what is meant as small scale and regards the term “edge of settlement” as self-explanatory. It is considered that the application of Policy 1 (Development Principles) will ensure that sites integrate with existing settlements. To identify the detailed requirements for every hypothetical case where a speculative application might be lodged would be unduly onerous and go against the focussed approach which the council is aiming to present in the local development plan.

77. I note that Policy 8 deals with circumstances where houses will be supported in the countryside and one of these instances is for affordable housing, where it is consistent with Policy 2. Policy 2 then provides more detail about the tests to be applied to affordable housing proposals. The 2 policies need to be read together. I am also aware that Policy 1 and paragraph 7 of the supporting text for Policy 2 will apply to all such proposals helping to ensure that new developments integrate with existing settlements. The recommended changes to the wording of Policy 2 will clarify what is meant by “small scale”.

78. I acknowledge that the term “edge of settlement” is currently used in Policy 8 whereas Policy 2 uses the term “adjacent to settlement boundaries”. Under Issue 2f (Countryside) it is recommended that the wording of Policy 8 should be amended to conform with the term used in Policy 2, which will remove any inconsistency. The comments with regard to “shortfall in local provision” are dealt with under Issue 2f. How developers will demonstrate that there are “no alternative sites available” within settlements will vary according to the settlement and I do not consider it necessary to identify detailed requirements within the policy. I agree with the council that such an approach would be unduly onerous.

79. I consider that, subject to the changes to wording suggested above and under Issue 2f, the wording of Policy 2 and Policy 8 would be consistent.

80. Finally, while welcoming the reduced rate of affordable housing required for sites which require remediation or those which are long term vacant or derelict (paragraph 10 of the supporting text), a further definition of long term vacant is requested in order to be
able to properly appraise sites. In addition, it is considered that the policy should be applied to any site that is costly to develop providing adequate evidence is shown by the developer.

81. Paragraph 10 of the supporting text states that “Further information is provided in the Affordable Housing Supplementary Guidance”. I consider that any further definition of long term vacant, if required, should be included in the supplementary guidance. This level of detail is not necessary in a local development plan. I am not convinced that the exemptions for affordable housing contributions should be extended further. The widening of the exemption to “any site” which is costly to develop has not been sufficiently justified. In any event, paragraph 6.6 of the supplementary guidance already recognises that there may be circumstances where development costs may be an issue. Where developers consider that the provision of affordable housing on-site would render the development uneconomic, the council will require them to submit a development appraisal which will be independently assessed. No change to the proposed plan is required.

82. I conclude that the wording of the first paragraph of the affordable housing part of Policy 2 and paragraph 7 of the supporting text should be amended as set out above.

83. See also Issue 2f (Countryside).

**Houses in multiple occupation (HMO)**

84. I agree with the council that reference, in the policy wording itself, to specific areas in Fife where restrictions on houses in multiple occupation currently exist is not necessary and could lead to future confusion if the areas expand from those currently designated. I accept that such detail is best contained within supplementary guidance. However, the policy and supporting text do not currently refer to supplementary guidance on houses in multiple occupation. In order to provide clarity on the areas where restrictions would exist, I find that such a reference should be made in the policy and supporting text.

85. I note that the background section of the council’s existing Supplementary Planning Guidance on Houses in Multiple Occupation mirrors the wording of paragraph 11 of the supporting text but that no reference is made to a specific number of residents. Instead, the supplementary planning guidance goes on to explain in some detail how houses in multiple occupation are dealt with in the licensing system, the planning system and building standards. This provides a comprehensive explanation of houses in multiple occupation guidance but I do not consider it appropriate to repeat this level of detail in a local development plan. I do, however, regard the reference to “3 or more unrelated people” without some associated explanation as not sufficiently clear and have concerns that it could be construed as contrary to the Use Classes Order. I conclude that the wording from the supplementary planning guidance should be used in paragraph 11. This would replace “3 or more unrelated people” with “a number of unrelated people.” Reference to provision of a more detailed explanation of the number of people involved and why, being provided in supplementary guidance, should then be added to the supporting text.

86. I have noted the contents of planning appeal PPA/250/576 – Greenside Court, St Andrews (not PPA/250/567 as referred to in the original representation) and the suggested conflict between paragraph 20 in the appeal decision and the supporting text
of the proposed plan on houses in multiple occupation. In response to my further information request FIR 2b, the council has now responded to this contention. The council confirms that the private rented housing market, which includes houses in multiple occupation, is an important element of the housing stock in St Andrews. Paragraph 12 of the supporting text states that houses in multiple occupation provide affordable accommodation for both “workers and students”. I also acknowledge the council’s response that Policy 2 aims to achieve a balance between the competing demands for accommodation and the need to maintain balanced and mixed communities and that the council’s supplementary planning guidance on houses in multiple occupation was adopted after the appeal decision. The restrictions introduced are for houses in multiple occupation irrespective of who occupies them. Taking all of this into account, I do not consider that the proposed plan needs to be amended as a result of this appeal decision.

87. I conclude that, subject to the amendments above, Policy 2, its supporting text and associated supplementary guidance can provide an adequate and justifiable policy response to the subject of houses in multiple occupation.

Care accommodation

88. The section on care homes states that, in consultation with other appropriate organisations, the council will seek to ensure that there is a justified distribution of nursing and residential care provision based on assessed local health and social care needs throughout Fife. Such provision should be in or adjacent to existing predominantly residential areas. However, the policy then goes on to say that the establishment of residentially based care in the community facilities “in other areas” will be supported in certain circumstances including where there are no other locations available or where other special circumstances exist.

89. I find that this provides adequate flexibility to allow appropriate developments to come forward in sustainable locations in the absence of available or suitable sites within a settlement boundary or allocated site. I, therefore, agree with the council that the addition of “within or adjacent to settlement boundaries” to the second sentence of this section of the policy is not necessary. Scottish Planning Policy recognises that there may be circumstances where planning permission would be granted for affordable housing on small sites that would not normally be used for housing, for example, because they lie outwith the adjacent built up area and are subject to policies of restraint (paragraph 130). A similar approach for care homes is not referred to. The council’s approach to affordable housing does not alter my view that no change to the care homes section is required.

90. I am aware that the provision of adequate support and accommodation for Fife’s growing elderly population is a significant challenge. Nevertheless, I do not accept that the wording of Policy 2 limits the delivery of accommodation to meet the needs of older residents to traditional institutional models of accommodation for the elderly such as care/nursing homes. Policy 2 is intended to cover all forms of housing provision but has some specific guidance on certain types of provision such as affordable housing, houses in multiple occupation, care homes and Travellers. It does not limit the delivery of older persons’ accommodation to the care home section only, this would be just one element of supply. Contrary to the arguments in the representation, I do not consider the scope of the policy to be too narrow. Furthermore, the term “care homes” covers a much wider range of accommodation than just “older persons’ accommodation”. I am not convinced
that the suggested change from the heading “care homes” to “older persons’ accommodation” would be appropriate.

91. Paragraph 129 of Scottish Planning Policy states that where permission is sought for specialist housing as described in paragraphs 132 to 134 (accessible and adapted housing, wheelchair housing and supported accommodation including care homes, sheltered housing, sites for Gypsy/Travellers and Travelling Showpeople and houses in multiple occupation), a contribution to affordable housing may not always be required. Following my further information request FIR 2b, the council has now responded to the representation which requests that affordable housing contributions from specialist accommodation for the elderly should, as a consequence, not be sought.

92. The council refers to its Supplementary Guidance Review on Affordable Housing which includes a reference to paragraph 129 of Scottish Planning Policy and states that care homes are exempt from the affordable housing policy (paragraph 8.3). I also note that the executive summary of the supplementary guidance review has a section on specific needs housing which states that currently, specific needs housing is exempt from making contributions to affordable housing. It is proposed to provide a more detailed definition of specific needs housing to clarify that developments must contain special design and/or management features. The council states that the supplementary guidance review will be adopted post examination as supplementary guidance and that it intends to include more detailed consideration of this issue. Scottish Planning Policy already provides a list of what constitutes “specialist housing” which it would not be appropriate to repeat in the plan. I consider that any further detail on this matter should be dealt with in supplementary guidance and not in the policy itself. The second paragraph of Policy 2 states that open market housing development must provide affordable housing “…consistent with the affordable housing supplementary guidance”. I am therefore satisfied that the proposed plan and its associated supplementary guidance can adequately reflect paragraph 129 of Scottish Planning Policy and no change to the proposed plan is required. The perceived need to encourage development of this nature to come forward, does not alter my conclusion.

93. The council has now responded to the objection to the policy restraint on proposals which would lead to a concentration of such facilities (FIR 2b). The council refers to a long standing policy approach of encouraging mixed communities, the undesirability of having areas which are only care homes and the need to encourage a diverse range of house types in a given area. However, I must also take into account the benefits of a degree of concentration of retirement/care housing. From an operational perspective, there are economies of scale and I accept that an unnecessary limitation on the scale of development could render certain proposals or operational models unviable.

94. As a consequence I find that this part of the policy should be amended to make it clear that provision should not lead to a concentration of such facilities “unless fully justified”. The supporting text should then include an explanation of the exceptional circumstances where a degree of concentration may be acceptable. This will avoid overly restricting the ability to provide nursing and residential care provision without damaging the council’s aim to encourage mixed tenure communities.

95. The council considers it difficult to quantify the demand for care homes and considers that allocating sites specifically for care homes is not required. I acknowledge that some rural villages have no elderly care home or facilities which ties up limited housing stock, much of it in single occupancy. Nevertheless, I am satisfied that the
current policy approach provides a framework within which any proposals for care homes in rural villages can be assessed, without the need to allocate specific sites at this time.

96. I conclude that the section on care homes and its supporting text should be amended as described above.

Miscellaneous

97. Comments with regard to the adequacy of consultation with local residents are dealt with under Issue 1 (General Comments).

Reporter’s recommendations:

I recommend that the following modifications be made:

1. In Policy 2: Homes replace the final sentence of the section on housing land supply with the following:

   “Where a shortfall in the 5-year effective housing land supply is shown to exist within the relevant Housing Market Area, housing proposals within this Housing Market Area will be supported subject to satisfying each of the following criteria:

   1. the development is capable of delivering completions in the next 5 years;
   2. the development would not have adverse impacts which would outweigh the benefits of addressing any shortfall when assessed against the wider policies of the plan;
   3. the development would complement and not undermine the strategy of the plan; and
   4. infrastructure constraints can be addressed.”

2. On page 195, add the following to the second sentence of paragraph 1 of the supporting text for Policy 2: Homes:

   “(See relevant Housing Land Audits which are prepared by the council on an annual basis).”

3. On page 195, replace paragraph 2 of the supporting text for Policy 2: Homes with the following:

   “Figure 2.4A and 2.4B show a significant housing supply shortfall in both housing market areas in the SESplan area of Fife. There were however, at the time of the 2015 Housing Land Audit, a further 4,909 units on housing sites which were considered by the council to be ineffective due to marketing only (4,249 in the SESplan area and 660 in the TAYplan area) and a large unconstrained supply currently programmed for beyond the plan period (over 10,000). In a more buoyant housing market, additional housing sites could come forward from either of these alternative sources of supply. Furthermore, the preparation of SESplan2 is well underway and expected to be issued in 2018. This could result in revised housing land requirement figures for the SESplan area of Fife.”
Therefore, while acknowledging the uncertainties with regard to the exact level of the shortfall, an early review of this local development plan is proposed in order to ensure a timeous response to any revised strategic housing target and to secure an on-going and sufficient supply of housing land. In the meantime, where a shortfall in the 5-year effective housing land supply does arise within a particular housing market area, a further release of housing land will be supported where Policy 2 is satisfied. This will enable housing proposals to be considered in advance of the review process and without unreasonable delay. At the same time the council will work closely with the home building industry to ensure the efficient delivery of the existing supply and to seek to overcome marketing issues or other constraints where possible.

4. On page 195, delete paragraphs 4 and 5 of the supporting text for Policy 2: Homes and remove from the proposed plan any other references to a “sequential test” in relation to housing.

5. On page 197, replace Figure 2.4 of the supporting text for Policy 2: Homes with the 2 tables in Annex 1 (taken from the information provided in further information request FIR 11b). First, update the figures in the tables to take into account the sites added/deleted/amended through the examination (see paragraph 49 above).

6. On page 198, delete Figure 2.1 of the supporting text for Policy 2: Homes.

7. In Policy 2: Homes delete the final sentence of the section on development requirements which starts “Applications which propose…”

8. In Policy 2: Homes replace the first paragraph of the section on affordable housing with the following:

   “Affordable Housing

   The development of sites adjacent to settlement boundaries, excluding green belt areas, solely for the provision of small scale affordable housing, may be supported where there is established and unmet local need and if no alternative site is available within a settlement boundary. In such instances, priority will be given to the redevelopment of brownfield sites. The scale of such adjacent development will reflect the character of the settlement – a maximum of 20 units for settlements with fewer than 200 households; a maximum of 30 units for settlements of between 200 and 1,000 households; and a maximum of 49 units for settlements of greater than 1,000 households.

9. On page 195, in paragraph 7 of the supporting text for Policy 2: Homes add the following to the first sentence:

   “and brownfield opportunities should be explored.”

10. On page 195, in paragraph 7 of the supporting text for Policy 2: Homes add the following final sentence:

    “Further guidance in terms of tenure and type is set out in the Affordable Housing Supplementary Guidance.”
11. In Policy 2: Homes add the following to the section on houses in multiple occupation:

“Further guidance is set out in the Supplementary Guidance on Houses in Multiple Occupation”.

12. On page 196, in paragraph 11 of the supporting text for Policy 2: Homes replace the first sentence with the following 2 sentences:

“A house or flat can be termed a house in multiple occupation (HMO) if it is the principal residence of a number of unrelated people. A more detailed explanation, of the number of people involved and why, is included in the Supplementary Guidance on Houses in Multiple Occupation.”

13. On page 196, add the following new sentence to paragraph 13 of the supporting text for Policy 2: Homes:

“Areas where restrictions on houses in multiple occupation are in place are described in the Supplementary Guidance on Houses in Multiple Occupation.”

14. In Policy 2: Homes add the following to the second sentence of the section on care homes:

“…unless fully justified.”

15. On page 196, in paragraph 17 of the supporting text for Policy 2: Homes add the following new second sentence:

“However there can be some benefits to a degree of concentration. From an operational perspective, there are economies of scale and an unnecessary limitation on the scale of development could render certain proposals or operational models unviable. Where these exceptional circumstances can be shown to exist, a certain level of concentration may be acceptable, if fully justified.”
### Figure 2.4A – Housing land requirements and supply by Housing Market Area (2009-2026)

<table>
<thead>
<tr>
<th>Housing Market Area Strategic Development Plan Area</th>
<th>Fife</th>
<th>Dunfermline and West Fife</th>
<th>Kirkcaldy, Glenrothes and Central Fife</th>
<th>SESplan</th>
<th>St Andrews and North East Fife</th>
<th>Cupar and North West Fife</th>
<th>TAYplan</th>
</tr>
</thead>
<tbody>
<tr>
<td>LDP housing land requirement</td>
<td>31,641</td>
<td>18,107</td>
<td>9,054</td>
<td>27,161*</td>
<td>2,940</td>
<td>1,540</td>
<td>4,480</td>
</tr>
<tr>
<td>Effective supply</td>
<td>18,803</td>
<td>9,120</td>
<td>6,337</td>
<td>15,457</td>
<td>2,042</td>
<td>1,304</td>
<td>3,346</td>
</tr>
<tr>
<td>Constrained sites coming forward</td>
<td>736</td>
<td>417</td>
<td>221</td>
<td>637</td>
<td>73</td>
<td>26</td>
<td>99</td>
</tr>
<tr>
<td>Housing completions SDP base - 2015</td>
<td>4,805</td>
<td>2,944</td>
<td>1,461</td>
<td>4,405</td>
<td>356</td>
<td>44</td>
<td>400</td>
</tr>
<tr>
<td>Windfalls</td>
<td>1,870</td>
<td>1,027</td>
<td>513</td>
<td>1,540</td>
<td>220</td>
<td>110</td>
<td>330</td>
</tr>
<tr>
<td>Small sites</td>
<td>656</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>379</td>
<td>277</td>
<td>656</td>
</tr>
<tr>
<td>Demolitions</td>
<td>789</td>
<td>445</td>
<td>344</td>
<td>789</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Total supply</td>
<td>26,081</td>
<td>13,063</td>
<td>8,188</td>
<td>21,250</td>
<td>3,070</td>
<td>1,761</td>
<td>4,831</td>
</tr>
<tr>
<td>Surplus/shortfall</td>
<td>-5,559</td>
<td>-5,045</td>
<td>-866</td>
<td>-5,910</td>
<td>130</td>
<td>221</td>
<td>351</td>
</tr>
</tbody>
</table>
### Figure 2.4B – Housing land requirements and supply by Housing Market Area (2016-2026)

<table>
<thead>
<tr>
<th>Housing Market Area Strategic Development Plan Area</th>
<th>Fife</th>
<th>Dunfermline and West Fife</th>
<th>Kirkcaldy, Glenrothes and Central Fife</th>
<th>SESplan</th>
<th>St Andrews and North East Fife</th>
<th>Cupar and North West Fife</th>
<th>TAYplan</th>
</tr>
</thead>
<tbody>
<tr>
<td>SDP housing land requirement</td>
<td>18,363</td>
<td>10,109</td>
<td>5,054</td>
<td>15,163*</td>
<td>2,100</td>
<td>1,100</td>
<td>3,200</td>
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<tr>
<td>Surplus/shortfall SDP base to 2016</td>
<td>7,676</td>
<td>4,714</td>
<td>2,521</td>
<td>7,235</td>
<td>186</td>
<td>255</td>
<td>441</td>
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<tr>
<td>LDP housing land requirement</td>
<td>26,039</td>
<td>14,823</td>
<td>7,575</td>
<td>22,398</td>
<td>2,286</td>
<td>1,355</td>
<td>3,641</td>
</tr>
<tr>
<td>Effective supply</td>
<td>17,743</td>
<td>8,578</td>
<td>6,072</td>
<td>14,650</td>
<td>1,843</td>
<td>1,250</td>
<td>3,093</td>
</tr>
<tr>
<td>Constrained sites coming forward</td>
<td>736</td>
<td>417</td>
<td>221</td>
<td>637</td>
<td>73</td>
<td>26</td>
<td>99</td>
</tr>
<tr>
<td>Windfalls</td>
<td>1,700</td>
<td>933</td>
<td>467</td>
<td>1,400</td>
<td>200</td>
<td>100</td>
<td>300</td>
</tr>
<tr>
<td>Small sites</td>
<td>500</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>300</td>
<td>200</td>
<td>500</td>
</tr>
<tr>
<td>Demolitions</td>
<td>200</td>
<td>150</td>
<td>50</td>
<td>200</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Total supply</td>
<td>20,479</td>
<td>9,778</td>
<td>6,709</td>
<td>16,487</td>
<td>2,416</td>
<td>1,576</td>
<td>3,992</td>
</tr>
<tr>
<td>Surplus/shortfall</td>
<td>-5,559</td>
<td>-5,045</td>
<td>-866</td>
<td>-5,910</td>
<td>130</td>
<td>221</td>
<td>351</td>
</tr>
</tbody>
</table>

*Note: The SESplan 2024-2026 requirement figures are calculated by annualising the figures in the SESplan HNDA - 2011. See table 3.1 of the SESplan Supplementary Guidance Housing Land Technical Note - 2013.*
<table>
<thead>
<tr>
<th>Issue 2c</th>
<th>Planning Obligations, Infrastructure &amp; Amenity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Body or person(s) submitting a representation raising the issue (including reference number):</td>
<td>Policy 4: Planning Obligations (cont)</td>
</tr>
<tr>
<td>Policy 4: Planning Obligations</td>
<td>sportscotland (48) The Thousand Huts Campaign (98) Scottish Natural Heritage (914)</td>
</tr>
<tr>
<td>Provision of the development plan to which the issue relates:</td>
<td>Policy 3 Infrastructure and Services, Policy 4 Planning Obligations, Development Strategy, Policy 10 Amenity</td>
</tr>
<tr>
<td>---------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------</td>
</tr>
</tbody>
</table>

**Planning authority’s summary of the representation(s):**

**Policy 3: Infrastructure and Services**

Sportscotland (47): The emphasis of paragraph 25 of the FIFEplan Proposed Plan (Core Document 5) is slightly different from SPP para 226; in that SPP requires evidence of a clear excess of provision before a facility may be lost. The LDP wording on the other hand suggests that these facilities may only be protected where still in use “or there is a demand for their use.” The concern is that demand can be suppressed which is quite different from there being a clear excess of provision locally.

Scottish Enterprise (1050): Considers that, through the Proposed Local Development Plan (and Supplementary Guidance) advice should be provided on the priority requirements for investment in infrastructure. Innovative means to secure such provision should also be explored. SE requests small changes to the text of both the policy (exceptions) and explanatory text.

Townhill Community Council (630): Requests firmer commitment to the co-ordinated approach necessary when a piece of infrastructure (including the Northern Relief Road – FIFEplan Proposed Plan reference DUN067) requires financing by both the Council and a developer.

Theatres Trust (952), SNH (913): Supports Policy as it helps to prevent the loss of viable and valuable cultural, tourism or community resources and welcome the inclusion of green infrastructure as Part 4 of Policy 3.

Hammerson (Kirkcaldy) Ltd (955), Stewart Milne Homes (1830), Homes for Scotland (1831), I Spowart (2066), Landvest PCC Ltd (1904) A & J Stephen Ltd (2169), J G Lang & Son (2195), Linlathen Developments (Tayside) Limited (2136): Policy should be amended to confirm that where appropriate infrastructure should be delivered and that not all types of development will require all the types of infrastructure listed. Consultation with the planning authority officers prior to or during the determination of application will confirm which types of infrastructure and the appropriate level of provision that would be required.

Network Rail (1853): Potential impacts from an increase in patronage to the railway may create the need for upgrades to the existing infrastructure including improved signalling, passing loops, car parking, improved access arrangements or platform extensions. Further, railway safety is a key concern.

Wemyss Trust (2079), Gladman (2754): Not all development proposals will give rise to such infrastructure requirements on a case by case basis and the policy should be modified to reflect this, perhaps by inserting the words ‘where relevant’ into the main body of the text.

Scottish Water (2120): Confirms that limited capacity at water or drainage works should not be seen as a barrier to development as early discussions with Scottish Water will
seek to view the available options to allow the development to proceed.

The William Brown Trust (3891): Fife Council’s list of infrastructure and service requirements for the provision of development is generally supported although Part 6 of the policy (and associated content within LDP Policy 11 - Low Carbon Fife) requires to be sufficiently flexible to ensure that the implementation of sustainable methods of energy generation does not hinder viability of housing sites.

**Policy 4 – Planning Obligations**

Sportscotland (48): seeks clarification that the provision of leisure facilities should include cinemas and similar not just outdoor sports facilities.

D McPhillimy (98): seeks exemption for rural huts used in reforesting and temporary living.

SNH (914): We have no specific comments to make on this policy.

Scottish Enterprise (1059): supports the basis of infrastructure funding but seeks a programme for investment with priority on infrastructure that will facilitate economic growth.

Scottish Enterprise (1051): Seek wording changes to the exemptions within the stated policy and to the accompanying explanatory text.

Hammerson (956): Objects to the inconsistency stated regarding obligations for retail development in so far as Policy 4 seeks education, transport, community and public art whilst the accompanying supplementary guidance excludes the need for education provision. Seeks clarity on what is meant by community infrastructure noting that greenspace is the only applicable requirement for retail development. Objects to retail development paying strategic transport obligations contending that only local impacts should apply.

Jacobs (1174): Objects to the lack of reference within the policy to development providing ‘evidence’ to ensure the delivery of stated infrastructure or services. Not all development proposals will be able to comply fully with the seven listed points. For example, bullet point number five which requires Information Communication Technology (ICT) will not be relevant for all proposals. In addition, the policy does not make allowance for proposals that could potentially provide additional cultural, tourism or community resources or infrastructure

Jacobs (1176): Objects to references to ‘adverse impacts’ seeking dispensation where overall benefit/s outweigh any detriment. Seeks statement confirming that planning conditions or alternative legal agreements will be considered before the use of a planning obligation. Objects to renewable energy not being listed as an exemption to planning obligations emphasising that any impacts from construction or use are temporary.

Taylor Wimpey (1726), Lynch Homes (3714), Avant Homes (3705): Seeks reference to the Circular 3/2012 including tests. Considers that the charging of commuted sums for proposed changes of use is contrary to Circular tests.
<table>
<thead>
<tr>
<th>Organization/Lawyer</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stewart Milne Homes (1834)</td>
<td>Objects to the preparation of supplementary guidance alongside Proposed Plan when opportunity existed to consolidate both and objects to requirement for housing developers to provide serviced employment land. References a supporting statement.</td>
</tr>
<tr>
<td>Network Rail (1861)</td>
<td>Objects to limiting planning obligations to development that has an impact on strategic infrastructure only noting the need for local rail improvements. Seek inclusion of works to the rail network infrastructure as exempt or excluded from planning obligations.</td>
</tr>
<tr>
<td>Homes for Scotland (1833), I Spowart (2070)</td>
<td>Objects to the preparation of supplementary guidance alongside Proposed Plan when opportunity existed to consolidate both and considers that this policy should state that planning obligations will be negotiated on a case by case basis mindful of the impact on the viability of a scheme.</td>
</tr>
<tr>
<td>Persimmon Homes (1988)</td>
<td>Seek a flat fee across Fife for education contributions rather than differing costs per catchment area. Objects to the preparation of supplementary guidance alongside Proposed Plan when opportunity existed to consolidate both.</td>
</tr>
<tr>
<td>Mark Richardson (1952, 1955)</td>
<td>Objects to the lack of a financial viability assessment for the published supplementary guidance and seeks clarification on what other approaches were considered. Further objects to the provisions in the SPG on Planning Obligations and request that the points raised in Homes for Scotland's submission (copy attached - 8th December 2014) are incorporated into the SPG as a pre Examination modification, failing which, the submission is used as the basis for Examination into the issue.</td>
</tr>
<tr>
<td>Landvest PVC (1907), A &amp; J Stephen (2171), J G Lang &amp; Son (2197), Linlathen Development Ltd (2140), Stirling Developments (2041, 3684)</td>
<td>Objects that no assessment or statement is made within the policy stating that obligations will only be sought where an infrastructure issue has to be addressed as a direct result of specific development.</td>
</tr>
<tr>
<td>Taylor Wimpey (1959), William Brown Trust (3892)</td>
<td>Objects to the requirement for new housing development to provide employment land contending that this should only be in specific cases and always in accordance with the tests within Scottish Government Circular 3/2012.</td>
</tr>
<tr>
<td>J Watchman (2522)</td>
<td>Objects to policy exemption from obligations for affordable housing and student accommodation querying how changes of uses within these tenures will be monitored.</td>
</tr>
<tr>
<td>Gladman (2755)</td>
<td>support the use of planning obligations and acknowledgment of viability considerations provided all are compliant with Circular 3/2012.</td>
</tr>
<tr>
<td>Scottish Government (3210)</td>
<td>Consider that Policy 4 should provide further details of the locations of development that will necessitate an obligation.</td>
</tr>
<tr>
<td>SEPA (3284)</td>
<td>supports the requirement within the policy for mitigation and accepts that new development will be required to address their impact on infrastructure.</td>
</tr>
</tbody>
</table>
### Development Strategy – Planning Obligations

Central Dunfermline Community Council (1367): Insert, cost and place priority on Appin Crescent as a strategic transport improvement indicating the timing of contributing developments and relationship to the planned infrastructure. Highlights the air pollution impacts and the role of this intervention in addressing this.

I Spowart (2052), Landvest PCC Ltd (1895), J G Lang & Son (2176), Linlathen Developments (Tayside) Limited (2122): Concerned that Fife Council are over-relying on developers to fund new infrastructure and does not appear to have a comprehensive and clear approach as to how infrastructure can be provided which does not inhibit timely and economically viable house-building.

Persimmon Homes (1961): All developer contributions need to be carefully considered as being directly relevant to the proposed development, and if a viability argument proves otherwise, there needs to be a realisation from Fife Council that certain developer contributions may be required to be removed or decreased.

Miller Homes (2769): Welcome Infrastructure Investment Fund but seek to ensure that all planning obligation requests should be assessed in line with the tests in Circular 3/2012

Andrew Blankenstein (1212): Where new development (both residential & commercial) is accessed via A class roads, sufficient provision is made to ensure traffic flows are not unduly impeded. Highlights that additional development such as that close to Bankhead roundabout will exacerbate the existing problem. The solution is to convert the A92 at Bankhead to an overpass with access roads to the existing roundabout (as was incorporated in the original proposal for Bankhead roundabout). Funding for the necessary road improvements should be raised from the planning gain accruing from the adjacent land developments.

### Policy 10: Amenity

Sportscotland (49): Sportscotland have two particular concerns about the wording of Policy 10 in connection with the protection of playing fields:

The introductory text notes that development will only be supported if it does not have a significant detrimental impact on amenity, this affords significantly less protection that the provisions of paragraph 226 of Scottish Planning Policy. Suggest explicit reference is made to the protection afforded to outdoor sports facilities by Scottish Planning Policy.

The term ‘playing fields’ in point 8 should be replaced by ‘outdoor sports facilities’ and defined in the glossary as per the Development Management Regulations 2013.

Brian Sheerins (831): Policy 10 should mention the need to consider the wellbeing of communities.

Jacobs (1189): With regards to the potential impacts of wind farms on amenity Policy 10 is not consistent with SPP paragraph 170 which states that: “Areas identified for wind farms should be suitable for use in perpetuity. Consents may be time-limited but wind farms should nevertheless be sited and designed to ensure impacts are minimised and to protect an acceptable level of amenity for adjacent communities.”
The Policy 10 presumption against development subject to meeting a number of tests should change to: “Development that protects an acceptable level of amenity for existing and proposed adjacent communities and land uses will be supported where it meets the following criteria.”

Gladman Developments Ltd (2760): Policy 10 should include a caveat to ensure that it is not used inappropriately to prevent housing development on unallocated sites which could address any shortfall in the effective housing land supply.

The Coal Authority (2743): The Coal Authority supports Policy 10; this incorporates the need to consider unstable land which is a locally distinctive issue within Fife. The Policy sets out a suitable planning policy framework for this important planning issue, that will help to implement The Coal Authority’s risk based approach to development management in Fife.

The Woodland Trust Scotland (2847): Woodland Trust Scotland believes that we need more native trees and woods in urban areas because they can provide physical and mental health benefits.

SEPA (3289): Support the protection provided in Policy 10 in relation to air quality and considers that it can provide a suitable policy context for dealing with Air Quality in Fife reflecting the approach outlined in SEPA’s Land Use Planning System Guidance Note 11. However, we recommend the text is amended to read ‘...Air Quality, with particular emphasis on the Air Quality Management Areas’ and that paragraph 6 is amended read ‘... particularly applies on Air Quality Management Area’s’ to strengthen the intention of the policy. We welcome the requirement for Air Quality Assessments where the Council considers that air quality may be affected by development proposals.

Support the requirement that developments consider their potential impacts on contaminated and unstable land with particular emphasis on the need to address potential impacts on the site and surrounding area. Welcome the requirement for further assessments where relevant. Such measures are supported on the understanding/assumption that the inclusion of contaminated land includes non-radioactive and radioactive substances; if this is not the case then we recommend that such references are provided within the policy context.

Support the inclusion of section 10 which protects the operation of existing or proposed waste management facilities from detrimental impacts of new development and consider this complies with Scottish Planning policy paragraph 184.

Stirling Developments (2039, 3683): Request that the policy wording makes specific reference itself to the ‘proportionate basis’ of infrastructure provision. For the avoidance of doubt, reference should be made to Circular 3/2012.

P M Uprichard (2816): Infrastructure and maintenance are not properly considered when development is approved creating detrimental impact to the public.

RSPB Scotland (2825): Recommend that the provision of habitat creation and management is included within policy and reference to strategic green networks.

Woodland Trust (2843): Would like to see ambitious targets for woodland creation and the Woodland Trust Scotland’s Woodland Access Standard clearly in the Local
Development Plan. This planning policy should encourage the inclusion of trees and woodland in open spaces in new developments. It should also consider carefully the scope for improved outdoor access routes, habitat corridors and woodland planting around new developments.

Hallam Land (3005): Policy 3 as currently worded does not explicitly meet the tests of the Circular 3/2012 Planning Obligations and Good Neighbour Agreements.

Scottish Government (3205, 3920): Emphasise the role of walking and cycling as per Scottish Planning Policy paragraph 237. Paragraph 3 on page 200 of the Proposed Plan refers to the transport hierarchy but in the bullet points it does not deal with the hierarchy in order as is detailed in paragraph 273 of SPP. Whilst the thrust of Policy 3 seeks to protect open space, it does not make specific reference to safeguarding outdoor sports facilities, or to the exceptions set out in paragraph 226 of SPP. Fife’s Proposed Plan does not include text on temporary greening, to comply with the requirement of SPP.

SEPA (3282): Support and welcome the policy but recommend that an extra bullet point is added or one of the existing bullet points is expanded to outline that any surface water strategy should seek to protect and improve the environment in accordance with policy 12.

Modifications sought by those submitting representations:

Policy 3 Infrastructure and Services

Sportscotland (47): Requirement should be to prove a clear excess of provision before outdoor sports facilities may be lost; with this in accordance with SPP.

Scottish Enterprise (1050): seeks the underlined changes submitted to be incorporated within FIFEplan Proposed Plan.

Hammerson (Kirkcaldy Ltd) (955), Stewart Milne Homes (1830), Homes for Scotland (1831), I Spowart (2066), Landvest PCC Ltd (1904), A & J Stephen Ltd (2169), J G Lang & Son (2195), Linlathen Developments (Tayside) Limited (2136): Introduction of additional text in the first paragraph adding ‘appropriate development’ and that “development proposals will be required to demonstrate....” as an alternative and more appropriate definition

Jacobs (1174): The Policy 3 wording should change to “Development proposals will only be supported where they demonstrate evidence (if relevant) to ensure the delivery of.” Policy 3 should include a new section entitled “Developments which provide ancillary infrastructure/services.”

Network Rail (1853): railway crossings should be listed as potential physical constraints requiring developers to address their impacts and propose mitigation Text changes within policy 2 criterion b, c and d.

Wemyss Trust (2079), Gladman (2754): seeks amended policy wording confirming that detailed requirements, where required, will be assessed and agreed at a detailed stage.
Policy 4 – Planning Obligations

Hammerson (956): delete reference within policy 4 to retail development providing an education obligation and remove the need for retail development to fund strategic transport interventions. Clarify wording of applicable retail development size thresholds.

Policy 10: Amenity

Sportscotland (49): The term ‘playing fields’ in point 8 should be replaced by ‘outdoor sports facilities’ and defined in the glossary as per the Development Management Regulations 2013. Specific reference should be made to the protection afforded to outdoor sports facilities by Scottish Planning Policy.

Brian Sheerins (831): Include a requirement to consider the wellbeing of communities in Policy 10.

Jacobs (1189): The first paragraph of Policy 10 should change to: “Development that protects an acceptable level of amenity for existing and proposed adjacent communities and land uses will be supported where it meets the following criteria.”

Gladman Developments Ltd (2760): Include a caveat in Policy 10m to ensure that it is not used inappropriately to prevent housing developments on unallocated sites which could address any shortfall in the effective housing land supply.

SEPA (3289): Policy 10 should be amended to read ‘...Air Quality, with particular emphasis on the Air Quality Management Areas’ and that paragraph 6 is amended read ‘... particularly applies on Air Quality Management Area’s’. If the reference to contaminated land does not include non-radioactive and radioactive substances these should be referenced in the policy.

Stirling Developments (2039, 3683): include text references within policy to ‘proportionate basis’ of infrastructure provision and Circular 3/2012.

RSPB Scotland (2825): amend paragraph 12, page 20 to include suggested text references.

Woodland Trust (2843): include amended text within policy reflecting the Woodland Standard and the planting of trees across protected open space.

Hallam Land (3005): refers to tests stated within Circular 3/2012 and ensure that obligations sought comply with each.

Scottish Government (3205, 3920): The Scottish Government requests additional wording be inserted into the plan to encourage temporary greening. Make specific reference to safeguarding outdoor sports facilities, cycling and the hierarchy of transport to comply with SPP.

SEPA (3282): Recommend that an extra bullet point is added to outline that any surface water strategy should seek to protect and improve the environment.
### Summary of responses (including reasons) by planning authority:

**Policy 3 Infrastructure and Services**

SportsScotland (47): Fife Council has indicated at Policy 10 that there is considered to be merit in this change and invites the Reporter to consider making a similar recommendation as appropriate, here.

Scottish Enterprise (1050): Fife Council does seek to prioritise investment in infrastructure and have through the Local Development Plan action programme (Core Document 53) and accompanying Planning Obligations Guidance (Core Document 46) summarised the requirements sought in addition to broadening the types of contributing development and detailing the likely anticipated phasing of proposed housing development. Innovative means to secure the investment in infrastructure is also described within the Proposed Plan including the basis for a Fife Infrastructure Investment Fund and the broadening of types of contributing development. This includes where applicable, commercial uses such as retail and leisure. Fife Council notes that the respondent is only seeking minor changes to the Proposed Plan policy text and as such does invite the Scottish Government reporter to consider making a recommendation on this issue. The respondent’s suggested changes to the text of both the policy (exceptions) and explanatory text are extracted and underlined here:

"……..Exemptions

*Developments, other than a change of use to of employment land or leisure site (see below), will be exempt from these obligations if they are for:……

……..In the case of a change of use proposed on an employment or leisure site. A a commuted sum payment will be required to offset the loss of the land for that use……..

……..The development categories which will be exempt from developer obligations are:

- Employment uses and town centre redevelopment proposals; ……..”

Townhill Community Council (630): Fife Council’s Planning Obligations Guidance (March 2015) (see CD46) provides guidance on how developers are required to fund community infrastructure when this is needed as a result of new housing or commercial activity. FIFEplan requires developer investment in new roads and schools across Fife. Fife Council is also continuing to fund infrastructure through the approved Capital Plan and by exploring new funding mechanisms. This includes strategic transport interventions such as the Northern Link Road, where each developer along its route will be required, through planning conditions, to provide a section of the road through their site. Construction of strategic routes through allocated sites will require road bonds, in terms of the Roads (Scotland) Act 1984 and the Security for Private Road Works (Scotland) Act 1985, as amended ensuring that the road/s can be completed by Fife Council should the developer fail to do so. The timing of the delivery of the strategic routes through the allocated sites will be controlled by planning conditions, master-plans and legal agreements.

Hammerson (Kirkcaldy Ltd) (955), Stewart Milne Homes (1830), Homes for Scotland (1831), I Spowart (2066), Landvest PCC Ltd (1904) A & J Stephen Ltd (2169), J G Lang & Son (2195), Linlathen Developments (Tayside) Limited (2136): The Scottish Government Circular/s and related legislation or guidance are referenced throughout the Fife Development Plan and are material considerations as individual planning applications are considered by Fife Council. This policy and accompanying requirements
from new development are considered compliant with tests set out within Circular 3/2012. Pre application discussions and consultation with officers including key agencies such as Transport Scotland will confirm which types of infrastructure are required and the appropriate level of provision necessary. Obligations will only be sought where additional impacts are evident from new development.

Jacobs (1174): Fife Council does seek to prioritise investment in infrastructure and have through the Local Development Plan action programme (Core Document 53) and accompanying Planning Obligations Guidance (Core Document 46) summarised the requirements sought in addition to broadening the types of contributing development. Where proposals do not comply with listed criteria an assessment will be made on merit as to how (if at all) these apply. Proposals that provide additional cultural, tourism or community resources or infrastructure are welcome where these comply with other appropriate policy tests as is evidence of how stated obligations will be provided from new development. In most cases this will be secured by planning conditions and legal agreements.

Network Rail (1853): Council Services such as Transportation & Environment and Education & Childrens Services, along with external partners and organisations such as rail or utility providers, have been consulted throughout the development planning process. In some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision.

Development proposals will, where applicable be subject to transport assessments which will identify measures and interventions required to make development proposals acceptable, using varied and the most sustainable transport options. Where new development can enhance the safety of the rail network and additional patronage impacts are evidenced, opportunities will be explored for improvements including signalling, passing loops, car parking, improved access arrangements or platform extensions. Network Rail will be consulted in this respect as relevant planning applications emerge and as the Fife Development Plan progresses.

Wemyss Trust (2079), Gladman (2754): The Scottish Government Circular/s and related legislation or guidance are referenced throughout the Fife Development Plan and are material considerations as individual planning applications are considered by Fife Council. This policy and accompanying requirements from new development are considered compliant with tests set out within Circular 3/2012.


Policy 4 Planning Obligations

Sportscotland (48): Leisure facilities could include sport or cinema facilities. Evidence should be sought of market demand locally and an assessment made of the most appropriate use.

The Thousand Huts Campaign (98): Fife Council does invite the Scottish Government reporter to consider making a recommendation on this issue and the respondent’s suggested exemption for rural huts used in reforesting and temporary living as this will encourage sustainable use of the countryside and assist with boosting the rural economy without overburdening infrastructure, facilities or services.
Scottish Enterprise (1059): Fife Council seeks to prioritise economic growth where this is in line with the Development Plan. It would be unreasonable to directly link economic development sites with obligations but infrastructure detailed is Fife wide and for the benefit of all land uses.

Scottish Enterprise (1051): Fife Council does seek to prioritise investment in infrastructure and have through the Local Development Plan action programme (Core Document 53) and accompanying Planning Obligations Guidance (Core Document 46) summarised the requirements sought in addition to broadening the types of contributing development and detailing the likely anticipated phasing of proposed housing development. Innovative means to secure the investment in infrastructure is also described within the Proposed Plan including the basis for a Fife Infrastructure Investment Fund and the broadening of types of contributing development. This includes where applicable, commercial uses such as retail and leisure. Fife Council notes that the respondent is only seeking minor changes to the Proposed Plan policy text and as such does invite the Scottish Government reporter to consider making a recommendation on this issue. The respondent’s suggested changes to the text of both the policy (exceptions) and explanatory text are extracted and underlined here:

"…….Exemptions
Developments, other than a change of use to of employment land or leisure site (see below), will be exempt from these obligations if they are for:……. 
…….In the case of a change of use proposed on an employment or leisure site, a commuted sum payment will be required to offset the loss of the land for that use…….
…….The development categories which will be exempt from developer obligations are:
- Employment uses and town centre redevelopment proposals; ……..”

Hammerson (956): Education provision is not considered to be reasonable to seek from retail development as no new permanent impacts will occur on school capacity. Fife Council does invite the Scottish Government reporter to consider making a recommendation on these issues and the respondents suggested changes to the text of both the policy (exceptions) and explanatory text. Retail catchment areas are set out within the Fife Retail Capacity Study. These confirm that trip generation and demand, for retail and leisure development over a certain threshold, is not confined to local impacts therefore it is considered reasonable to seek strategic transport contributions from qualifying retail development.

Jacobs (1176): Paragraph 3 in Applying Policy 4 states that only housing and retail development over certain thresholds will pay planning obligations. The exemptions referenced in Policy 4 relate to housing therefore there is no need to mention renewables. Impacts on amenity and local infrastructure are covered by Policies 1, 3 and 10 of FIFEplan.

Taylor Wimpey (1726), Lynch Homes (3714), Avant Homes (3705): The Scottish Government Circular/s and related legislation or guidance are referenced throughout the Fife Development Plan and are material considerations as individual planning applications are considered by Fife Council. This policy and accompanying requirements from new development are considered compliant with tests set out within Circular 3/2012. The charging of commuted sums where impacts cannot be otherwise addressed is an established principle endorsed through previous Local Plan examinations and will only be applicable for changes of use where these are not exempt from planning obligations.
Network Rail (1861): Local transport improvements are central to the FIFEplan Local Development Plan strategy. These are the responsibility of developers and network operators where they relate to individual planning applications and direct impacts. Otherwise they will be addressed based on funding availability and need or impact.

Where a Transport Assessment is submitted in support of a planning application this should quantify in detail the likely impacts on the rail network; including level crossing use and station capacity. Transport Assessments should take cognisance of impacts to existing rail infrastructure to allow any necessary developer contributions towards rail to be calculated.

Fife Council does invite the Scottish Government reporter to consider making a recommendation on these issues and the respondents suggested changes to the text of both the policy (exceptions) and explanatory text exempting operational rail network works from obligations.

Homes for Scotland (1833), I Spowart (2070), Stewart Milne Homes (1834): The Fife Planning Obligations Guidance is an approved expression of Fife Council policy following Executive Committee consideration in September 2014 (Supporting Document – Minute 9 September 2014).

The guidance has been consulted on and implemented as a non-statutory part of the Fife Development Plan with the effective date of 2 March 2015 as it provides information which would be otherwise too detailed to contain proper within the Local Development Plan.

It remains the intention of Fife Council to reflect any Proposed plan examination changes to relevant policies within the FIFEplan Proposed Plan by approving Supplementary Guidance post adoption of the Proposed Plan. Viability and negotiation on a case by case basis is a central consideration in the assessment of planning applications.

Persimmon Homes (1988): Work is ongoing with Education and Children’s Services to publish summary information on all schools and catchment areas. This will accompany the revised Supplementary Guidance when available and include applicable costs. Catchment details are available on the Council website and school rolls and capacities are reported annually to the Scottish Government.

Mark Richardson (1952, 1955) It is unreasonable to do a financial viability assessment on the policy/s that will cater for this every eventuality (of development or site) but Fife Council will consider this where individual circumstances apply or where proposals cause significant infrastructure impacts. The publication of financial frameworks and planning policy on planning obligations was an approach tested through previous local plan examinations and Fife Council is continuing to fund infrastructure through the approved Capital Plan and by exploring new funding mechanisms. This includes strategic transport interventions. Further request that the points raised in Homes for Scotland’s submission (copy attached - 8th December 2014 - see supporting document) are incorporated into the SPG as a pre Examination modification.

Landvest PVC (1907), A & J Stephen (2171), J G Lang & Son (2197), Linlathen Development Ltd (2140), Stirling Developments (2041, 3684), Miller Homes (2769): The policy and accompanying non-statutory guidance (Core Document 46) does refer to the Circular/s and related legislation or guidance throughout including that obligations will
only be sought where direct additional impacts from development occur. This will continue as individual planning application are progressed and considered by Fife Council. The policy and this approach is considered compliant with tests set out within Circular 3/2012.

Taylor Wimpey (1959), William Brown Trust (3892), Stewart Milne Homes (1834), Persimmon Homes (1988): Where necessary, the provision of employment land as part of new housing development ensures that new large development areas stimulate the local economy as part of sustainable approach to growth. However, to ensure compliance with Circular 3/2012 obligations will only be sought in areas of identified need. Contributions to employment land will only be required from larger scale new development as set out within development requirements in the Local Development Plan, or where the housing development directly reduces or places an additional burden on available employment land in the key settlements with a shortage of supply as defined by the Fife Employment Land Strategy (CD18). This will only apply to new housing development of 50 or more homes, leisure or retail development, non-employment uses located on sites already allocated for employment or those sites in existing employment use. This reflects the larger probable impacts this size of new development will have on existing economic development facilities and ensures local job provision reducing commuting. Fife Council therefore invites the Scottish Government reporter to amend sub paragraph 3 of applying Policy 4 (see CD5 page 204) with an extra sentence to read:

“… Community infrastructure includes the provision of employment land, greenspace and public art. In the case of employment land, contributions will only be sought for housing development of 50 or more homes, (in areas with an identified shortfall in employment land supply) leisure or retail development, non-employment uses located on sites already allocated for employment or those sites in existing employment use. Employment land supply is measured by the Fife Employment Land Strategy’ (CD18).

J Watchman (2522): The provision of affordable housing is in itself, an integral consideration for all development proposals. Housing Association Grant funding is not eligible to pay for other off site non-housing costs such as education payments. Student accommodation or changes of uses are considered unlikely to give rise to significant additional transport, education or community infrastructure impacts but where this does occur Fife Council have reserved the right to require obligations and local measures to address impacts.

Scottish Government (3210): Fife Council does invite the Scottish Government reporter to consider making a recommendation on these issues and the respondents suggested changes to the text of both the policy (exceptions) and explanatory text. The strategic transport intervention zones including costs and summary details on the calculation of commuted sums including the thresholds for employment land provision and education obligations are suggested for inclusion.

Development Strategy – Planning Obligations

Central Dunfermline Community Council (1367): Air quality issues at Appin Crescent are addressed in local plan Proposal DUN 065 – Appin Crescent Bypass( CD5, page 78) which states that the proposal is intended to address the air quality objectives, as identified by the Air Quality Management designation. A suite of transportation interventions aimed at supporting the delivery of the strategy are also proposed for
Dunfermline (see Proposals DUN 067 Northern Link Road; DUN 068 Western Distributor; DUN069 – Bothwell Gardens Roundabout; and DUN 070 Pitreavie Roundabout). These interventions are proposed as a result of the Dunfermline Transport Assessment (CD56), undertaken in 2011 to inform the Dunfermline & West Fife Local Plan 2012 (CD8).

A Strategic Transport Appraisal (CD19) has also been undertaken which tests the ability of the trunk road network to accommodate the proposed development. This and associated progress on allocated development areas in addition to levels of funding secured will enable Fife Council and Transport Scotland to prioritise the delivery of particular transport interventions based on need and ensuring no net detriment on existing traffic flows. The recently approved Fife Council Air Quality Strategy (Core Document 54) will also assist providing information on how in the interim issues of air pollution and related matters can be addressed.

I Spowart (2052), Landvest PCC Ltd (1895), J G Lang & Son (2176), Linlathen Developments (Tayside) Limited (2122): Fife Council continues to advocate partnership working with development interests to deliver the Development Plan proposals. In that respect Fife Council will hold financial contributions for strategic transportation improvements within the Fife Infrastructure Investment Fund (FIIF) and manage education impacts within the relevant catchment school area. This approach will not alter the stated methodologies for requesting and deploying planning obligations but does provide an opportunity for cumulative contributions to be used in the most effective manner, whilst remaining compliant with the tests of reasonableness and relevance within Scottish Government Circular 3/2012. It is expected that developers, when preparing proposals, consult the Development Plan and (where relevant) strategic frameworks or masterplans to ascertain the Council’s requirements before entering into discussions on developer contributions. This should take place preferably prior to and during the pre-application stage. Negotiations and the drafting of planning agreements will be determined between the Council and prospective developers, ensuring that the type, timing and amount of contribution required is clearly and unambiguously stated.

Persimmon Homes (1961): It is important that planning obligations match the additional demands from developments as they arise. Infrastructure works and transportation improvements directly associated with the development are normally required to have been carried out before occupation although, in some instances, a limited amount of development can take place to help fund the improvements and to reflect the timing when the impact of development begins to be felt on infrastructure.

Where financial contributions for other off-site works and longer term projects are expected, the Council will determine an agreed phasing for contributions from developers. It is accepted that, on occasion, the demands for planning obligations will be greater than the development is able to bear, requiring some degree of ‘prioritisation’. Any assessment in this respect shall however be supported by a development appraisal which Fife Council, via the District Valuer, or another independent chartered valuation surveyor, will verify.

Andrew Blankenstein (1212): The transportation methodology referenced within policy relates to strategic interventions identified within the Development Plan. These road network interventions are on Figure 5 of Planning Obligations Guidance (Core Document 46) and the LDP spatial strategy and proposal map/s. The methodology draws on forecast traffic flows from development and assesses these against identified strategic
road network interventions. Additional likely traffic flows are considered alongside a zoned assessment of where proposed development is located. Local measures will be identified in site specific Transport Assessments prepared by site promoters.

Quality of Place

Fife Council notes the neutral or supportive comments made.

Policy 10: Amenity

Outdoor sports facilities

Sportscotland (49): Fife Council agrees that the wording of Policy 10 does not provide the level of protection for outdoor sports facilities that is required by Scottish Planning Policy para 226 (see CD1 page 51). Fife Council considers there is merit in adding text safeguarding outdoor sports facilities from development into Policy 3: Infrastructure and Services in the ‘Loss of Valuable Infrastructure’ section and invites the Reporter to make an appropriate recommendation on this matter.

An additional point could be added to this section as follows:

4. the loss of existing or proposed outdoor sports facilities unless:

- the proposed development is ancillary to the principal use of the site as an outdoor sports facility; or
- the proposed development involves only a minor part of the outdoor sports facility and would not affect its use and potential for sport and training; or
- Equivalent or better alternative provision will be provided in a location that is convenient for users, or by the upgrading of an existing outdoor sports facility to provide a facility of better quality on the same site or at another location that is convenient for users and maintains or improves the overall playing capacity in the area; or
- The Council accepts there is local overprovision.

Fife Council also considers there is merit in replacing the term 'playing fields' in point 8 with the term 'outdoor sports facilities' in line with Scottish Planning Policy. Fife Council invites the Reporter to make an appropriate recommendation on this issue.

Wellbeing of communities

Brian Sheerins (831): The Fife Council Plan 2017 includes ‘Improving Quality of Life in Local Communities’ as one of its aims (see supporting document 1 page 193). Policy 10 of FIFEplan Proposed Plan is directly linked to this aim at the top of page 229. The elements listed within the policy are those related to new developments which are considered to potentially have the greatest impacts on the quality of life of individuals and communities and so are considered to address the issue of the wellbeing of communities in amenity terms.

Amenity impact of windfarms

Jacobs (1189): The potential impact of wind farms on nearby communities is dealt with
in detail in Fife Council’s Wind Energy Supplementary Guidance. The reference in policy 10 point 3 is more general and covers wider instances of nuisances. It is therefore considered that policy 10 does not need to specifically reflect Scottish Planning Policy paragraph 170 (see CD1 page 41).

‘Protecting the amenity of new and existing development and considering the implications of development for water, air and soil quality’ is a key principle of Scottish Planning Policy (see CD1 page 10). It is therefore considered that the wording of Policy 10 which only supports development ‘if it does not have a significant detrimental impact on the amenity of existing or proposed land uses’ is more appropriate than the alternative wording provided by Jacobs (1189) which refers to protecting an ‘acceptable level of amenity’.

Air Quality

Scottish Environment Protection Agency (3289): Fife Council considers there is merit in changing the references in Policy 10 and Applying Policy 10 paragraph 6 from in Air Quality Management Areas to on Air Quality Management Areas as suggested by SEPA (3289) as this would help to strengthen the intention of the policy and invites the Reporter to make an appropriate recommendation on this matter.

Inappropriate use of Policy 10

Policy 10 cannot be used in isolation and must be used in conjunction with Policy 1. This prevents Policy 10 being used in isolation as a route for housing developments. Applying policy 2 includes the methodology Fife Council will apply for addressing potential housing land shortfall to establish if the principle of housing is acceptable on an unallocated site. Policy 10 will be used to assess in more detail the impact of any development on the amenity of existing or proposed land uses. It is therefore not considered that a caveat is needed to prevent the inappropriate use of policy 10 to prevent housing development on unallocated sites.

Reporter’s conclusions:

1. In these conclusions, representations are addressed policy-by-policy and generally in the order in which matters appear in the proposed plan.

Policy 3: Infrastructure and Services - scope of requirements

2. Various concerns have been expressed regarding the scope of Policy 3.

3. I agree that the second sentence in Policy 3 can be interpreted as requiring for all proposals delivery of all seven of the following items. This would not be reasonable. Infrastructure and services should only be required if the proposed development gives rise to a need for them in order to make the proposed development acceptable.

4. Circular 3/2012 is concerned with planning obligations rather than infrastructure and services, but in practice there is overlap between the two. The five tests in the circular (paragraph 14) are a helpful guide as to what infrastructure and services may properly be required as part of a development proposal.
5. I conclude that Policy 3 should be altered so that the wording reflects more precisely the intentions of the council and the spirit of Circular 3/2012.

6. I note that item 7 in Policy 3 is not a kind of infrastructure or service. The wording of the policy should be adjusted accordingly.

7. Where it is reasonable for information not to be available at the planning permission in principle stage, I find it likely that a condition could be imposed on any permission requiring that the information be ascertained, submitted and approved prior to commencement of development. For this reason, the proposed plan need not be altered in this particular regard.

8. Regarding low and zero carbon technologies, it seems to me that Policy 3, with the alterations that I am recommending, would accord with the references to “proportionate” and “necessary” in the “Outcomes” paragraph that immediately precedes the policy. No further alteration is needed to address this particular concern.

9. Regarding support for development that would improve infrastructure and services, I find Policy 3 is primarily directed at ensuring that development is both served by the infrastructure which it needs and has no detrimental effect on availability of infrastructure to existing users. I conclude that, while improvements to infrastructure are generally very welcome, Policy 3 need not include the additional section sought in the representation.

Policy 3: Infrastructure and Services - priority requirements

10. Regarding priority requirements for investment in infrastructure, I find that Policy 3 is primarily directed to meeting infrastructure needs arising from new development and to protecting existing resources. The policy is not the place for addressing any difficulties that might arise in securing sufficient funding for provision of necessary new infrastructure. I note that the representation does not suggest any alteration to Policy 3.

11. My conclusion is that Policy 3 need not be altered.

Policy 3: Infrastructure and Services - advance provision of infrastructure

12. With regard to providing key infrastructure before houses are built and the particular reference to the Dunfermline Northern Link Road, I find that Policy 3 sets out the principle that new development should be accompanied by delivery of, among other things, local transport and access routes. The last sentence in paragraph 1 on page 200 of the proposed plan indicates that necessary infrastructure is likely to be provided before or during the delivery of the development.

13. In the case of large-scale developments, it is likely that master plans will be required. For example, requirements relating to development in the North Dunfermline Strategic Area include master plans (page 71 of the proposed plan). The timing of delivery of necessary new infrastructure can be addressed in such master plans, as well as in conditions and legal agreements associated with planning permissions. Policy 4: Planning Obligations makes provision, among other things, for securing infrastructure. These aspects of the proposed plan give adequate scope for seeking and implementing appropriately firm commitment to putting in place necessary infrastructure.
14. My conclusion is that Policy 3 need not be altered.

**Policy 3: Infrastructure and Services - routes for movement**

15. It is suggested that Policy 3 and paragraph 2 on page 200 of the proposed plan should refer to “safe” access routes. This would help address concern arising from increased use of level crossings. It is also suggested that, to accord with paragraph 273 of Scottish Planning Policy, Policy 3 should emphasise the role of walking and cycling and paragraph 3 on page 200 be altered to reflect the transport hierarchy.

16. I note that Scottish Planning Policy (paragraphs 270, 271 and 273) says that the planning system should support patterns of development which provide safe opportunities for movement. Implications for road safety should be taken into account. Development accessible by walking and cycling should be encouraged. The order of priority is walking, cycling, public transport, cars.

17. In view of the advice in Scottish Planning Policy, I conclude that the wording of the proposed plan should be altered in the ways proposed in the representations.

**Policy 3: Infrastructure and Services - green infrastructure**

18. I note that paragraph 229 of Scottish Planning Policy says that development plans should encourage the temporary use of unused or underused land as green infrastructure. I find that, to accord with Scottish Planning Policy, on page 201 of the proposed plan, the section headed “Green Infrastructure” should encourage temporary greening as suggested.

**Policy 3: Infrastructure and Services - outdoor sports facilities**

19. I note that paragraph 226 of Scottish Planning Policy refers to “outdoor sports facilities”. I also note that paragraph 25 in the proposed plan and Policy 3 to which it relates do not refer to “outdoor sports facilities”. Instead, they refer to “open space”.

20. “Open space” is defined in the proposed plan’s Glossary. The definition (the same as that in Scottish Planning Policy) includes a reference to Planning Advice Note 65. Planning Advice Note 65 describes types of open space. One type is “sports areas”. These are “large and generally flat areas of grassland or specially designed surfaces, used primarily for designated sports (including playing fields, golf courses, tennis courts and bowling greens) and which are generally bookable”.

21. The description of “sports areas” in Planning Advice Note 65 has some similarities to the definition of “outdoor sports facilities” in Scottish Planning Policy, but there are differences. This is significant because it is the safeguarding of outdoor sports facilities that is required by paragraph 226 of Scottish Planning Policy.

22. My conclusion is that, to address the justifiable concern in the representation that paragraph 25 on page 202 is not consistent with paragraph 226 of Scottish Planning Policy, the paragraph should include a reference to outdoor sports facilities. This in turn requires there to be reference to outdoor sports facilities in Policy 3. A new sub-paragraph at the end of Policy 3, as suggested by the council, subject to some adjustment to achieve conformity with Scottish Planning Policy, would meet this requirement.
Policy 3: Infrastructure and Services - protected open space

23. I note that Policy 3 says that, subject to certain conditions, development proposals will not be supported where they would result in loss of open space. In addition, I am recommending that the policy make specific reference to outdoor sports facilities.

24. It would not be appropriate to impose an unqualified bar on development on open space. As indicated by Policy 3, there may be circumstances - for example when replacement open space is to be provided or where there is an accepted local overprovision - in which loss of open space is acceptable.

25. My conclusion is that the proposed plan, as modified, provides adequate protection for open space and further change to Policy 3 is not necessary.

Policy 3: Infrastructure and Services - woodland creation

26. I find that Policy 3 is directed to ensuring that development is served by adequate infrastructure and services. Any new provision of infrastructure and services required by the policy must relate to needs arising from the development.

27. One kind of provision mentioned in Policy 3 is green infrastructure. In the Glossary, the definition of “green infrastructure” includes woodlands and trees.

28. My conclusion is that Policy 3 already makes adequate provision for woodland creation. It would not be appropriate to set targets in the policy.

Policy 3: Infrastructure and Services - the railway network

29. Regarding effects of growth areas and housing allocations on existing rail infrastructure, I find that new development on the scale envisaged in the proposed plan may have implications for railway infrastructure. Scottish Planning Policy says the planning system should support patterns of development that enable the integration of transport modes (paragraph 270). Development should be accessible by public transport (paragraph 273).

30. I conclude that the railway network should be mentioned in the supporting text.

Policy 3: Infrastructure and Services - capacity for water treatment

31. The concern that limited capacity at water treatment works should not be seen as a barrier to development relates to paragraph 6 on page 200 of the proposed plan. I find that the text of paragraph 6 does not suggest that limited capacity is necessarily a barrier to development. My conclusion is that the proposed plan need not be altered.

Policy 4: Planning Obligations - balance of advantage and scope

32. I find that Policy 4 is categoric. It says that developer contributions “will be required” if a proposal would have an adverse impact on strategic infrastructure or an adverse community impact. I find that this is too stringent because it excludes the possibility of weighing adverse impact against benefits that a proposal might confer.

33. I also note that Circular 3/2012: Planning Obligations and Good Neighbour
Agreements (paragraph 12) says: “Planning obligations should be agreed between the parties involved; developers should not be required (my emphasis) to enter into a planning obligation.” This suggests that the wording of Policy 4 is too prescriptive.

34. I conclude that Policy 4 should be altered. One of the representations suggests that “will” should be replaced by “may”. This would retain the word “required” which in my view does not accord with Circular 3/2012. A more appropriate phrase is “will be sought”. This phrase should be used in the first paragraph of the policy and elsewhere in the policy.

35. I note that Circular 3/2012 (paragraph 14) sets out five tests. The third test is “relate to the proposed development either as a direct consequence of the development or arising from the cumulative impact of development in the area”. Thus it is not solely direct impacts that may properly be the subject of a planning obligation. My conclusion is that Policy 4 should not be limited by inserting “direct” before “adverse impact on strategic infrastructure capacity” as suggested.

36. I find that developments may have a localised impact on infrastructure that is not strategic infrastructure and that such impact might in some circumstances be best addressed by means of a developer contribution. I also note that Policy 4 has a possible ambiguity in that sub-paragraphs 1 and 2 in the first part of the policy refer simply to “infrastructure”, not to “strategic infrastructure”. My conclusion is that “strategic” should be deleted from the second line of policy 4.

37. I find nothing in Policy 4 to suggest that negotiations would not be on a case-by-case basis. The importance of development viability is recognised in Circular 3/2012 (paragraphs 2 and 22). The fourth and fifth tests in paragraph 14 of the circular indicate that obligations should be proportionate and reasonable. The proposed plan says that regard will be had to the circular (paragraph 2 on page 204). Bearing in mind all these points, I conclude that the suggested changes to the policy to state that obligations will be negotiated on a case-by-case basis, that impact on development viability will be considered and that obligations should be proportionate and reasonable are not necessary.

Policy 4: Planning Obligations - Circular 3/2012

38. The purpose of Policy 4 is to indicate circumstances in which development contributions will be sought. Paragraph 2 on page 204 of the proposed plan makes it clear that the council, in applying the policy, will have regard to Circular 3/2012: Planning Obligations and Good Neighbour Agreements. To simply reiterate the five tests that are set out in paragraph 14 of the circular would defeat the purpose of the policy. For these reasons, I conclude that Policy 4 should not be altered in the way suggested.

39. I do not accept the need to include in Policy 4 a sentence to the effect that developer contributions must accord with Circular 3/2012. All planning authorities are expected to act in accordance with advice in government circulars, whether the circulars are or are not mentioned in development plans. In the present case, Circular 3/2012 is certainly of very particular relevance and is mentioned in paragraph 2 on page 204 of the proposed plan. My conclusion is that there is no need to mention it in Policy 4 also.

40. I note that Circular 3/2012 says (paragraph 15) that planning authorities should consider the following options in sequence: (i) use of a planning condition, (ii) use of an
alternative legal agreement, and (iii) use of a planning obligation.

41. The bullet points in Policy 4 contain two things. One is a description of mechanisms by means of which infrastructure requirements may be secured. The other is saying that supplementary guidance will be relevant. I find that, to achieve necessary clarity and to reflect paragraph 15 of the circular, the first bullet point should list all three mechanisms, namely conditions, legal agreements and planning obligations. The second and third bullet points should then be combined to say that supplementary guidance will be prepared. The text must also give necessary detail as to the content of the planning obligations supplementary guidance.

42. I see no reason why payment of a commuted sum is inevitably contrary to Circular 3/2012. A proposed agreement to pay a commuted sum would, like any other proposed agreement, be subject to the five tests.

Policy 4: Planning Obligations - exemptions

43. It is not clear to me why the exemptions in Policy 4 might be contrary to the tests in Circular 3/2012: Planning Obligations and Good Neighbour Agreements. Policy 4 as a whole indicates the circumstances in which an obligation will be sought. The exemptions are part of this picture. The tests come into play once an obligation is being contemplated. My conclusion is that exemptions may properly be included in the policy.

44. In policy 4, exemptions 5 and 6 are affordable housing, special needs housing, sheltered housing and student housing. The rationale for exempting these categories of development is questioned. There is concern that other, non-exempt developments will have to “pick up the tab”.

45. I find that the tests set out in paragraph 14 of Circular 3/2012 mean that obligations should relate to the proposed development, not to some other development. Obligations should fairly and reasonably relate in scale and kind to the proposed development. The council is committed to having regard to the circular (paragraph 2 on page 204 of the proposed plan). In all the circumstances, I conclude that there is no need to delete exemptions 5 and 6.

46. I agree that significant environmental, economic and community benefits are often associated with renewable energy and railway infrastructure developments. On the other hand, these kinds of developments are not the only ones that may have various benefits. The rewording of Policy 4 that I am recommending (replacement of “required” by “sought”) will facilitate a balancing exercise in which possible need for a developer contribution could be weighed against factors such as community benefit and development viability. In addition, it is possible that renewable energy and railway infrastructure developments might give rise to an adverse impact that is best addressed by means of a planning obligation. For all these reasons, my conclusion is that the list of exemptions should not be extended to refer to renewable energy developments and railway infrastructure developments as suggested.

47. It is suggested that, if “railway infrastructure developments” is not added to the list of exemptions, it should be added to the six bullet points in paragraph 9 on page 204 of the proposed plan. In my view, this would be inconsistent with the conclusion in the preceding paragraph.
Policy 4: Planning Obligations - policy wording; employment uses and town centre redevelopment proposals

48. It is contended that, in the first line of text under the heading “Exemptions”, “to” should be deleted and replaced by “of”. I find that, although this is of the nature of a typographical correction, it requires consideration because it has a significant effect on the meaning of the policy. The proposed change makes it clear that the change of use in question is a change from employment or leisure to some other use, and not the other way around. This is what the context demands, and the proposed plan should be altered accordingly.

49. The proposed change in the wording of the text that follows on from the numbered list of exemptions relates to what is clearly a typographical error. I agree that the text should be corrected.

50. Regarding the additional bullet point suggested in paragraph 9 on page 204 of the proposed plan, as this reflects item 3 in the “Exemptions” section of Policy 4 it would be appropriate to include it in paragraph 9.

51. Regarding priority for provision of infrastructural investment essential to economic growth, I find that this is outwith the scope of Policy 4. This is because Policy 4 is essentially concerned with the need for contributions and obligations that arise from individual development proposals.

Policy 4: Planning Obligations - retail development and education

52. I agree that it is difficult to envisage a situation in which retail development would give rise to a need for education provision. I note that paragraph 3 on page 204 of the proposed plan refers to “proportionate obligations” “as appropriate”. It would be neither proportionate nor appropriate for a proposed retail development, being a development that had no effect on education provision, to be subject to an obligation requiring augmented education facilities. The wording of paragraph 3 allows for this. I therefore conclude that paragraph 3 need not be altered.

Policy 4: Planning Obligations - retail development and community infrastructure

53. I note that the Glossary in the proposed plan says that “infrastructure” may include community facilities. The Glossary entry for “Community Facilities or Services” says “Community Facilities or Services: such as shops, post office, schools, leisure, entertainment, recreation and transport.” I find that the Glossary contains a reasonably adequate explanation of what is meant by community infrastructure and there is no need for an explanation in policy 4. I note that the definition of community infrastructure does not include employment land. The intention to seek planning obligations in relation to employment land is considered below.

54. I note that, in Policy 4, the reference to community infrastructure is within a list of matters that are to be included in planning obligations supplementary guidance. In this context, the policy is not saying that all developments (which would thus include retail development) must contribute to community infrastructure. If there is no adverse impact, there will be no requirement for a developer contribution. Against this background, I find that there is no need to restrict the scope of “community infrastructure” to greenspace in relation to retail development as sought in the representation. For reasons given later, I
am recommending changes to Policy 4 that result in the term “community infrastructure” no longer appearing in the policy.

Policy 4: Planning Obligations - loss of leisure facilities

55. The last part of paragraph 9 on page 204 of the proposed plan refers to “leisure facilities”. Sportscotland suggests it be made clear that “leisure facilities” refers to “outdoor sports facilities”.

56. The significance of “outdoor sports facilities” is set out above in relation to Policy 3. My recommendations seek to ensure that, in terms of Policy 3, there will be no loss of existing or proposed outdoor sports facilities except in certain circumstances. As it is outdoor sports facilities that have this special status, I find that paragraph 9 should be altered. “Leisure facilities” should be deleted and replaced by “outdoor sports facilities”. To ensure consistency and clarity, this change in wording requires alterations to the “Exemptions” section of Policy 4. In this section, “leisure site” appears twice. In both instances it should be deleted and replaced by “outdoor sports facilities”.

Policy 4: Planning Obligations - retail development and transport

57. It is contended that paragraph 3 on page 204 of the proposed plan should be amended to say, in brief, that retail developments greater than 2,500 square metres gross floor area will provide appropriate obligations for transport and greenspace.

58. Regarding greenspace, in a preceding section of these conclusions I have already found that there is no need to limit the scope of community facilities to greenspace when retail development is under consideration.

59. Regarding transport, I note the argument that retail development may reduce the need to travel to more distant shopping centres and so relieve pressure on strategic transport facilities. As with community facilities, I find that, if there is no adverse impact, there will be no requirement for a developer contribution. This applies to impact on any type of infrastructure and not just transportation. My conclusion is that paragraph 3 on page 204 need not be altered.

Policy 4: Planning Obligations - rural huts

60. Policy 4 seeks developer contributions where development will have an adverse impact on communities or strategic infrastructure. It seems to me that rural huts are unlikely to have adverse impacts of these kinds. I find that there are many other kinds of development that are also unlikely to have such impacts. It would not be practicable to attempt to list all of them in the policy. In any event, if a development of whatever kind were likely to have an adverse impact on communities or infrastructure, it would be appropriate for it to come within the scope of Policy 4 as modified. I conclude that there is no need to alter Policy 4.

Policy 4: Planning Obligations - need for more information

61. It is contended that, to accord with Circular 6/2013, the proposed plan should specify items for which financial or other contributions will be sought and the circumstances (locations and types of development) where they will be sought. This contention is not opposed by the council. In its response to the representations, the
council suggests that the following be included in the proposed plan: the strategic transport intervention zones, including costs; the thresholds for employment land provision; and education obligations.

62. In a request for further information (FIR 5), I asked the council to provide full details of the changes that the council believes should be made to Policy 4 and its associated text. The council’s response covers a number of topics. In relation to employment land, the council recommends the following addition to paragraph 3 of Applying Policy 4 (proposed plan, page 204):

“Community infrastructure includes the provision of employment land, greenspace and public art. In the case of employment land, contributions will only be sought for housing development of 50 or more homes (in areas with an identified shortfall in employment land supply). In addition leisure, retail or other non-employment uses proposed on sites already allocated for employment or in existing employment use will provide replacement employment land or a commuted sum. Employment land supply is measured by the Fife Employment Land Strategy.”

63. Other parties have commented on the council’s response to the request for further information. Points made include the following.

- It is important that approaches to securing developer contributions are subject to appropriate levels of scrutiny.
- There must be consistency between Policy 4 in the proposed plan and related supplementary guidance.
- Policy 4 and the related supplementary guidance lack detail on what is required for each development site.
- The Planning Obligations Framework Guidance March 2015 does not constitute statutory guidance. It does not contain enough detail to make possible calculation of financial impact on individual sites.
- Concern remains regarding contributions towards employment land. It is not clear which sites will be subject to this requirement. It is not clear why 50 dwellings has been selected as a threshold. This is neither fair nor reasonable. The Planning Obligations Framework Guidance March 2015 does not specify which sites will be asked to contribute. Does the requirement apply only to proposals for housing on land that is allocated for or in use as employment land? It is unreasonable to expect a landowner to bear the cost of providing and servicing employment land. There is nothing to suggest that need for new employment land can be a direct consequence of provision of new residential development. There is no national or regional policy basis for requiring house-builders to subsidise delivery of employment land. The council places reliance on the Fife Employment Land Strategy. This is a non-statutory document that does not align with SESplan and that has not been subjected to adequate public scrutiny. There is conflict with Circular 3/2012.
- Experience indicates that the employment land requirement will be too onerous and will impact on delivery of housing. In those parts of Fife where land values are least strong, the cumulative impact of developer obligations costs could make development impossible. The council should undertake a cost and viability analysis of its proposals. This would identify the gap between the cost of essential infrastructure and what the house-building industry can afford and can be reasonably expected to pay.
Policy 4 should be amended so that the brownfield land exemption is not restricted to land within a defined settlement but applies to all brownfield land and contaminated sites.

64. I note that paragraph 32 of Circular 3/2012: Planning Obligations and Good Neighbour Agreements says “Broad principles, including the items for which contributions will be sought and the occasions when they will be sought should be set out in the SDP or LDP, where they will have been subject to scrutiny at examination. Methods and exact levels of contributions should be included in statutory supplementary guidance”.

65. Paragraph 139 of Circular 6/2013: Development Planning refers to suitable topics for supplementary guidance and topics that should be included in the plan itself. One of the categories of matters that should not be included in supplementary guidance is “items for which financial or other contributions, including affordable housing, will be sought, and the circumstances (locations, types of development) where they will be sought”. Suitable topics for supplementary guidance, provided there is an appropriate context in the plan, include “exact levels of developer contributions or methodologies for their calculation”.

66. From the circulars, I find that the proposed plan must:

- make clear the circumstances in which developer contributions will be sought;
- say what kinds of development may be subject to a request for contribution;
- say whether location of development affects the amount of contribution or the need for any contribution at all; and
- say what the contributions are needed for.

I also find that, if they are not included in the proposed plan, the following must be included in supplementary guidance:

- exact levels of developer contributions; and
- the methods used to calculate the amount of contributions.

67. I find that the first sentence of Policy 4 describes in general terms the circumstances in which developer contributions will be sought. It refers to “infrastructure capacity”. “Infrastructure” is defined in the Glossary. It “may include” schools and community facilities. “Community facilities” has its own entry in the Glossary. The meaning of infrastructure is thus reasonably clear. It includes transport and schools.

68. As well as transport and schools, the second bullet point in Policy 4 indicates that planning obligations supplementary guidance will include community infrastructure. The Planning Obligations Framework Guidance March 2015 (figure 2 and section 5) has four matters under community infrastructure: affordable housing; greenspace; public art; and employment land. To be adequately clear, Policy 4 must explicitly state that it applies to these kinds of infrastructure.

69. The first sentence of Policy 4 refers to “community impact”. This term is not defined
in the Glossary. As already noted, “infrastructure” may include community facilities. I also note that, in Policy 4, the two numbered uses to which contributions will be put are confined to provision of infrastructure. These uses make no reference to mitigating community impact. From these points, I find that the reference to “community impact” is both lacking in clarity and unnecessary. My conclusion is that, in the interests of clarity, there should be no reference to community impact. Reference solely to infrastructure capacity is adequate.

70. The second bullet point in Policy 4 refers to the “application of the Planning Obligations Supplementary Guidance ….” This could be interpreted as referring specifically to the Planning Obligations Framework Guidance March 2015. To avoid confusion, this part of Policy 4 should make clear that there is an intention to prepare, adopt and issue supplementary guidance. This would avoid giving any impression that the Planning Obligations Framework Guidance March 2015 will necessarily be what is eventually adopted. The same applies to the other supplementary guidance mentioned in the third bullet point of Policy 4. Thus the second and third bullet points should be reworded.

71. In Policy 4, the section headed “Strategic Development Areas” says that planning obligations in strategic development areas are set out in figure 4.1. Figure 4.1 lists nine strategic development areas and indicates that obligations regarding transport and education will be sought. I note that, in the settlement plans section of the proposed plan, sites that are part of strategic development areas have development requirements that mention need not only for transport and education but also for other facilities. For example, Dunfermline N/W/SW and North Dunfermline both have affordable housing, open space and public art listed along with road improvements and schools.

72. To avoid lack of clarity, the text under “Strategic Development Areas” should be amended to make it clear that the transport and education obligations shown in Figure 4.1 are not the only obligations that may be sought in relation to development in the strategic development areas. The text should also be amended to be consistent with other recommended changes to Policy 4.

73. My conclusions regarding use of “required” at the beginning of Policy 4 and regarding references to the planning obligations supplementary guidance mean that the text under the heading “Public Art” in Policy 4 must be altered to be consistent with the rest of the policy.

74. The council suggests that the strategic transport intervention zones, including costs, be included in the proposed plan. I see no objection in principle to including information of this kind in a local development plan. In the present case, this information has not been included in the proposed plan as presented for examination. For this reason, I find that the information has not been adequately open to public scrutiny as part of the local development plan preparation and examination process and for this reason should not be included in the proposed plan. As indicated above, Scottish Government circulars indicate that exact levels of developer contributions and methods used to calculate the amount of contributions are matters that may be appropriate in supplementary guidance. In the present case, it would be appropriate for Policy 4 to say that calculation of transport contributions may involve a zoning methodology.

75. Representations object to the requirement that employment land be provided in connection with new housing development. These representations arise from the
Planning Obligations Framework Guidance March 2015, which includes reference to a requirement for employment land. I note that Policy 4 and its associated text mention a need to offset loss of employment land. This is in the context of exemptions. There is no mention of requiring provision of employment land in connection with new housing development or in other circumstances.

76. In its responses, the council suggests that extra text be added to paragraph 3 on page 204 of the proposed plan. I find that the explanation that community infrastructure includes provision of employment land does not give Policy 4 the clarity that it should have. If public art merits a separate heading in Policy 4, so does employment land. My conclusion is that Policy 4 should have a section headed “Employment Land”. This section should explicitly state that provision of employment land may be sought. It should indicate clearly the circumstances in which such provision will be sought.

77. The first circumstance in which provision for employment land will be sought is indicated by the last paragraph but one in Policy 4. This refers to “change of use proposed on an employment ….. site”. A more precise version of this wording should be put under the “Employment Land” heading.

78. The second circumstance in which provision for employment land will be sought arises from the Settlement Plans section of the proposed plan. In this section, development requirements for some sites include provision of employment land. Policy 4 should refer to this.

79. In its response, the council indicates that employment land contributions will be sought in relation to housing development of 50 or more dwellings in areas with an identified shortfall in housing land supply. On this matter, I make the following points.

80. It is not clear why a threshold of 50 dwellings is put forward.

81. The plan seeks to allocate sufficient land to meet the housing land requirement. It is not clear to me why, taking into account the amount of new housing for which land is being allocated, the plan should not have also allocated sufficient employment land to meet present and future needs for such land. This would have eliminated any need to seek employment land by means of a general requirement applying to all housing developments of 50 or more dwellings.

82. As already noted, a number of sites in the Settlement Plans section of the proposed plan have employment land as a developer requirement. The present examination process gives opportunity for each developer requirement of this kind to be scrutinised on a site-by-site basis. This adequately addresses concern about lack of public scrutiny. I am not convinced that the same can be said of a general requirement applying to all housing developments of 50 or more dwellings, especially as it does not appear in the proposed plan as submitted for examination.

83. From these points, I conclude that Policy 4 should not seek obligations for employment land in relation to housing developments of 50 or more dwellings.

84. I note that the council is suggesting that there be reference to obligations being sought from housing developments over 10 units and retail development over 2,500 sq metres. I am not aware of any representation that seeks this being included in Policy 4. In any case, the recommendations for Policy 4 will result in a policy that permits
85. It is suggested that the brownfield land exemption be extended so that it applies to all brownfield land and contaminated sites. I find that this would lend support to development outwith settlement boundaries. Policy 1: Development Principles supports development within settlement boundaries or where the “proposed use is supported by the Local Development Plan”. The suggested exemption extension would thus mean that development on brownfield sites and contaminated land outwith settlement boundaries would be supported even if it were not in accord with the strategy of the plan. For this reason, I find that the exemption should not be extended.

Policy 4: Planning Obligations - supplementary guidance

86. Representors contend that the content of draft supplementary guidance that has been prepared by the council should have formed part of the proposed plan. The representations do not specify matters that should be included in Policy 4 and do not demonstrate that omissions render the policy unsatisfactory. If detailed matters contained in the Planning Obligations Framework Guidance March 2015 were to be recommended by me for inclusion in the proposed plan, there would be no scope for further public scrutiny of these matters. In the circumstances, I do not recommend any alteration to Policy 4 in response to these representations.

87. In representation 1834, concern is expressed with regard to proper scrutiny of the Planning Obligations Framework Guidance March 2015. Comments are made on the content of the Framework. The process for preparation and adoption of supplementary guidance is a separate matter and is outwith the scope of this examination of the proposed plan.

Development Strategy - Planning Obligations

88. I note that there are concerns that the council may be over-relying on developers to fund new infrastructure and that there does not appear to be a comprehensive and clear approach as to how infrastructure can be provided without inhibiting house-building.

89. I find that the question of possible over-reliance relates to the economics of individual development proposals. The economic position is influenced by many factors that may change significantly over relatively short periods of time. The changes to Policy 3 and Policy 4 that I am recommending should help facilitate giving weight to the effect of developer contributions on development viability. Scottish Planning Policy recognises that there is a role for developer contributions. My conclusion is that the proposed plan need not be altered in response to these concerns.

90. Regarding concern about additional traffic on A class roads, I note that Policy 4 in the proposed plan makes provision for developer contributions in respect of infrastructure capacity and that Policy 10 seeks to avoid significant detrimental impact on amenity in relation to traffic movements. I find that this adequately provides for consideration of the effects of additional traffic on the road network.

91. It is suggested that the plan should require developer contributions towards the cost of providing the Appin Crescent Bypass (DUN 065). I note that Figure 4.1 on page 206 of the proposed plan includes reference to strategic and local transport improvements in
the Dunfermline area. Footnote 3 says the Transport Assessment of 2011 includes a
detailed intervention scheme breakdown. I take it that this is a reference to the
Dunfermline Strategic Land Allocation Transport Assessment of 2011. I have found no
reference to the Appin Crescent Bypass in the 2011 Assessment.

92. Under issue 7a(1): Dunfermline & Halbeath – Allocated Sites/Other Proposals
(Non SDA), recommendations 3 and 4 make reference to a need for transport
assessments and to effects of traffic on air quality. This adequately addresses concern
about Appin Crescent and its proposed bypass. It is for the council to decide in the first
instance what reference, if any should be made to the Appin Crescent Bypass in its draft
planning obligations supplementary guidance.

Policy 10: Amenity - outdoor sports facilities

93. Policy 10 indicates that, among other things, development must not have a
“significant detrimental impact on amenity in relation to ….. loss of playing fields, open
space …..” Scottish Planning Policy (paragraph 226) says that outdoor sports facilities
should be safeguarded from development except in certain defined circumstances.

94. I find that Policy 10 affords significantly less protection to outdoor sports facilities
than is required by Scottish Planning Policy. This subject is addressed in relation to
Policy 3. Additional text that I am recommending for Policy 3 will give outdoor sports
facilities the level of protection set out in Scottish Planning Policy.

95. It is suggested that, in item 8 of Policy 10, “playing fields” be deleted and replaced
by “outdoor sports facilities”. This, along with the adding a definition of “outdoor sports
facilities” to the Glossary, would give greater precision and for this reason is desirable.

96. The change of wording in item 8 would mean that, under Policy 10, development
must not lead to a significant detrimental impact on amenity in relation to outdoor sports
facilities. At the same time, under modified Policy 3, development proposals must not
result in loss of existing or proposed outdoor sports facilities (except in certain defined
circumstances). In my view, this might cause confusion.

97. To ensure clarity, safeguarding of outdoor sports facilities should be addressed in
only one of the two policies. The safeguarding is more conveniently provided in modified
Policy 3. I see no need to alter the scope of the protection of amenity afforded by
Policy 10 if text is added to the policy to make clear that safeguarding of outdoor sports
facilities is addressed by Policy 3.

Policy 10: Amenity - wellbeing of communities

98. I find that the ten listed matters in Policy 10 are all ones that have a bearing on the
wellbeing of communities. The list is comprehensive in that it appears to provide the
basis for protecting the wellbeing of communities from adverse effects that might arise
from new development. No addition to the list is suggested. I conclude that the
proposed plan need not be altered.

Policy 10: Amenity - accordance with Scottish Planning Policy

99. Paragraph 170 of Scottish Planning Policy says that wind farms should be sited and
designed to ensure impacts are minimised and to protect an acceptable level of amenity
for adjacent communities. The approach in Policy 10 is avoidance of significant detrimental impact. I do not find conflict between these aspects of Scottish Planning Policy and the proposed plan. The last of the guiding principles contained in paragraph 29 of Scottish Planning Policy refers to protecting the amenity of new and existing development. I find that Policy 10 accords with this principle.

Policy 10: Amenity - housing on unallocated sites

100. It is requested that Policy 10 contain a caveat to ensure that it is not inappropriately used to prevent housing development that addresses a shortfall in housing land supply. The request does not demonstrate how Policy 10 might be capable of inappropriate use. It seems to me that the matters specified in Policy 10 are all ones that may give rise to relevant material considerations in the development management process. My conclusion is that the plan need not be changed.

Policy 10: Amenity - air quality

101. I agree that it is not only development within air quality management areas that may have an impact on air quality in such areas. Development elsewhere can also have an impact. To reflect this, the wording of Policy 10 and of paragraph 6 on page 230 should be adjusted.

102. See also Issue 2g (Low Carbon) where further changes are recommended to Policy 10 and its supporting text.

Reporter’s recommendations:

I recommend that the following modifications be made.

1. In Policy 3: Infrastructure and Services, delete “Development proposals will only be supported where they provide comprehensive evidence to ensure the delivery of:”. Instead put:

   “Where necessary and appropriate as a direct consequence of the development or as a consequence of cumulative impact of development in the area, development proposals must incorporate measures to ensure that they will be served by adequate infrastructure and services. Such infrastructure and services may include:”

2. In Policy 3: Infrastructure and Services, in paragraph 1 under “Infrastructure Delivery” delete the text and put instead:

   “Local transport and safe access routes which link with existing networks, including for walking and cycling, utilising the guidance in Fife’s Designing Places Supplementary Guidance(1)”

3. In Policy 3: Infrastructure and Services, delete “7. A satisfactory timetable for the delivery of 1 to 6, above.” Instead put the following as a new, unnumbered paragraph:

   “Measures incorporated in development proposals in accordance with this policy must include a timetable for delivery of the identified infrastructure and services.”
4. In Policy 3: Infrastructure and Services, add the following at the end of the policy:

   “4. The loss of existing or proposed outdoor sports facilities unless:
   
   - the proposed development is ancillary to the principal use of the site as an outdoor sports facility; or
   - the proposed development involves only a minor part of the outdoor sports facility and would not affect its use and potential for sport and training; or
   - equivalent or better alternative provision will be provided in a location that is convenient for users, or by the upgrading of an existing outdoor sports facility to provide a facility of better quality on the same site or at another location that is convenient for users and maintains or improves the overall playing capacity in the area; or
   - it has been demonstrated that there is clear excess of provision to meet current and anticipated demand in the area and that the site would be developed without detriment to the overall quality of provision.”

5. On page 200, in the first bullet point in paragraph 2 before “access” insert “safe”.

6. On page 200, delete paragraph 3 and put instead:

   “3. Access to footpaths, cycleways and public transport will be important for the sustainable functioning of new development and the potential beneficial impacts on greenhouse gas emissions. In applying this policy, the Council will expect development to promote opportunities for travel by more sustainable modes in the following order of priority: walking, cycling, public transport, cars. Accordingly, development proposals will demonstrate how they:

   - Provide footpaths, cycleways and roads designed for all users which integrate in with existing footpaths, cycleways and roads;
   - Provide safe routes to public transport, schools, and community facilities;
   - Link to the existing or planned public transport network. Where public transport provision is limited, opportunities should be investigated for the introduction of an enhanced service to serve the site;
   - Address any impacts on road safety, particularly impacts on community facilities such as schools or parks; and
   - Address impacts on the local road network and the railway network including capacity. Once impacts have been identified through Transport Assessments, mitigation must be identified and agreed prior to an application being determined;

   Fife's Designing Places Supplementary Guidance(2) will provide more guidance on the design of movement routes for new development.”

7. On page 201, add the undernoted text after paragraph 18 and renumber the paragraphs that follow.

   “19. Temporary greening can be an appropriate way to create safe and attractive places until development comes on stream. The Council will support temporary greening of land awaiting development, where appropriate. Consideration will be given to whether greening of a site could bring about a positive impact on the local environment and overall amenity of the area, without prejudicing the effectiveness
and viability of the site, if it is allocated for development in the longer term."

8. On page 202, the following should be added at the end of paragraph 25:

   "In the particular case of open space which is an outdoor sports facility, change of use will be supported only if one of the bullet points in sub-paragraph 4 under the heading “Loss of Valuable Infrastructure” in Policy 3 is met."

9. On page 203, delete the whole of Policy 4 and put instead the following.

   "Policy 4: Planning Obligations

   “Developer contributions will be sought in relation to development proposals that will have an adverse impact on infrastructure capacity. The kinds of infrastructure to which this policy applies include transport, schools, affordable housing, greenspace, public art and employment land. The contributions will mitigate development impact by:

   1. Making a contribution to existing infrastructure, or providing additional capacity or improving existing infrastructure; or
   2. Providing new infrastructure.

   This will be applied through planning conditions, legal agreements and planning obligations.

   Planning obligations supplementary guidance will be prepared. The guidance will contain details of how impacts will be assessed and how amounts of developer contributions will be calculated in relation to transport, schools, affordable housing, greenspace, public art and employment land. In relation to transport, the guidance may involve a zoning methodology. Supplementary guidance regarding affordable housing and designing places will also be relevant.

   Strategic Development Areas

   Planning obligations in Strategic Development Areas with regard to transport and education are set out in Figure 4.1. Obligations may also be sought for other kinds of infrastructure. More detail is given in the relevant entries in the Settlement Plans section of the plan. Details of methodologies to be used to calculate site-specific obligations will be shown in the planning obligations supplementary guidance that is to be prepared.

   Employment Land

   Provision of employment land will be sought in the following circumstances:

   • where proposed development, other than development for employment purposes, would result in loss of land that is (a) in use as employment land; or (b) designated as “safeguarded employment area”; or (c) allocated for “employment”; or
   • where proposed development is on a site that is in the Settlement Plans section of this plan and where the development requirements for the site include provision of employment land."
Public Art

A contribution towards on-site public art will be sought in relation to major and prominent housing and retail proposals. A methodology for calculating the contribution will be set out in the supplementary guidance that is to be prepared regarding planning obligations. The supplementary guidance regarding designing places will also be relevant.

Exemptions

Developments, other than a change of use of employment land or outdoor sports facilities (see below), will be exempt from these obligations if they are for:

1. The conversion or renovation of an existing building, particularly if it is listed;
2. The re-use of derelict land or buildings, previously developed land, or the rehabilitation of contaminated land within a defined settlement;
3. Employment uses and town centre redevelopment proposals;
4. Residential development of fewer than 10 houses, or retail proposals of less than 2,500 square metres gross floor area;
5. Proposals for affordable housing, special needs housing, and sheltered housing; or
6. Proposals for student housing.

In the case of a change of use proposed on an employment or outdoor sports facilities site, a commuted sum payment will be sought to offset the loss of the land for that use and allow reinvestment. See Policy 5 (Employment Land and Property) for further information.

The Council has established an Infrastructure Investment Fund to assist in funding infrastructure to enable development. Its use is explained in the Planning Obligations Supplementary Guidance.

10. On page 204, in paragraph 9, include the following as an additional bullet point:

   “Employment uses and town centre redevelopment proposals;”

11. On page 204, in the last sentence of paragraph 9, delete “leisure facilities” from the two places where they are mentioned and put instead “outdoor sports facilities”.

12. In Policy 10: Amenity, in item 1 delete “in” and put instead “on”.

13. In Policy 10: Amenity, in item 8 delete “playing fields” and put instead “outdoor sports facilities”.

14. In Policy 10: Amenity, immediately preceding the heading “Air Quality” insert the following new paragraph:

   “For the avoidance of doubt, safeguarding of outdoor sports facilities is addressed by Policy 3: Infrastructure and Services.”

15. On page 230, in paragraph 6 delete the first sentence and put instead:
“Impacts on air quality must be considered as part of the overall assessment of a development proposal. This applies particularly to impacts on Air Quality Management Areas (AQMAs).”

16. In the Glossary, after “Open Space” insert a new item:

“Outdoor sports facilities: Uses where Sportscotland is a statutory consultee under the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013, which establishes ‘outdoor sports facilities’ as land used as: (a) an outdoor playing field extending to not less than 0.2 hectare used for any sport played on a pitch; (b) an outdoor athletics track; (c) a golf course; (d) an outdoor tennis court, other than those within a private dwelling, hotel or other tourist accommodation; and (e) an outdoor bowling green.”
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<th>Issue 2d</th>
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<tr>
<td>Development plan reference:</td>
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<td>Body or person(s) submitting a representation raising the issue (including reference number):</td>
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<td>Employment Land</td>
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<td>Scottish Enterprise (1045)</td>
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<td>Policy 5: Employment Land and Property</td>
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<td>Scottish Enterprise (1052)</td>
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<td>SEPA (3285)</td>
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<td>Provision of the development plan to which the issue relates:</td>
<td>Fife Spatial Strategy: Employment</td>
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<td>Planning authority’s summary of the representation(s):</td>
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<tr>
<td>Fife Spatial Strategy: Employment</td>
<td>Scottish Enterprise (1045): Support the identification of employment land and the protection of that land supply and welcome the intentions of Policy 1 to protect that supply.</td>
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<td>Scottish Enterprise (1045): The Proposed Plan needs to recognise the significant amount of work carried out by both the public and private sectors during recent years to seek to bring forward sites for employment use (remedial works etc.) and to recognise that additional timescales may be required to release their potential for employment purposes. This specifically relates to those sites of greater strategic significance and the need to ensure that they remain as available employment sites prior to any disposal for alternative uses.</td>
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<td>Lawrence Bell (1265): I believe jobs before housing accommodation, should involve forward planning.</td>
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<td></td>
<td>Rob Thompson (1349): Would like to see an additional sub-paragraph recognising the particular challenge to small local businesses located in conservation areas of rural villages. Creating shop fronts in keeping with surrounds is expensive and difficult. Many rural villages are losing their focal point e.g. Culross and Limekilns. Suggest incentivising initiatives through interest free loans and reduced business rates.</td>
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Policy 5: Employment Land


Scottish Enterprise (1052): Support all strategic employment allocations and considers that no overriding case could be made to justify the loss of any strategic site (in whole or in part) from the economic land supply.

Scottish Enterprise (1052): Support, in general, Policy 5, which safeguards the identified employment but some concern that the policy allows for loss of employment land, if justified based on market conditions at time of application. This could introduce uncertainty for investment and could have significant impact upon the supply of economic land. There may be specific reasons why a site may not have been brought forward for development, which may be unrelated to market conditions.

Scottish Enterprise (1052): In the supporting text, paragraph 6 refers to the need to provide replacement employment land, if a proposal results in net loss and paragraph 7 to the ability to pay a commuted sum instead of replacing employment land. Support this approach in principle but minor amendment is required to the Policy and supporting text to ensure that the locational requirement for replacement land is stated, any commuted sum is ring-fenced towards bringing forward/upgrading existing employment land, and a marketing strategy is identified. Fife Council should consider the preparation of Supplementary Guidance to provide greater advice in this respect.

Scottish Environment Protection Agency (3285): We support the intention of policy 5 in so far as it relates to our organisational interests and particularly welcome the reference within “Applying Policy 5”, paragraph 5 that “waste management facilities may be appropriate in locations identified for class 5 or class 6 uses...” subject to considerations of compatibility and impact on amenity or operation of existing and proposed businesses. We consider that this complies with SPP 2014 paragraph 186. From our organisational perspective Policy 5 along with Policy 3, 10 & 11 provides a good coverage of waste management issues we would expect to be addressed in the Local Development Plan.

Modifications sought by those submitting representations:

Fife Spatial Strategy: Employment

Scottish Enterprise (1045): Amend text at end of paragraph 12 to read:
‘..., and Fife Renewables Innovation Centre and remedial works and other infrastructural works at Rosyth (including the new Forth Road Crossing bridge).’

Scottish Enterprise (1045): Add additional text at end of paragraph 13 to read:
‘Fife Council, in consultation with Key Agencies, recognises in particular the importance of the development of strategic sites for long term economic growth and employment purposes, beneficial locally, regionally and nationally. Uncertainty over the delivery of strategic sites can undermine investor confidence, and can deter investment decisions, particularly in the current competitive economic circumstances. As certainty is essential...’
PROPOSED FIFE LOCAL DEVELOPMENT PLAN

Rob Thompson (1349): Insert additional sub-paragraph recognising the particular challenge to small local businesses located in conservation areas of rural villages.

Policy 5: Employment Land

Scottish Enterprise (1052): Amend Policy 5 (new text is underlined) to read:

All existing employment areas, and those allocated in this Plan, identified on the Proposals Map, will be safeguarded for continued industrial and business use. Development for industrial or business uses in these areas will be supported only if:

1. It is in an employment use class consistent with existing or proposed employment activity on the site or neighbouring employment site; and – or

2. It will not restrict the activities of existing or future businesses on the site or neighbouring employment sites.

Scottish Enterprise (1052): Amend the supporting text of Policy 5 to read:

6. In circumstances where a development would result in a net loss in employment land, and there is an overriding justification for that development which is supported by Policy 1 Part A2 (Development Principles), developers will be required to replace the lost employment land in an appropriate location to meet existing and future employment and business needs, as defined at that time by Fife Council and other key agencies. In justifying the loss of employment land, applicants will be expected to demonstrate measures taken to seek the prior implementation of the employment allocation, including a minimum of 12 months marketing of the site through direct and internet methods and through consultation with Fife Council and other key agencies and will be expected to provide evidence of infrastructural or other constraint which has restricted the implementation of the use and which will not be overcome in the short and medium term. The employment land supply will be monitored through Fife Council’s Employment Land Audit.

7. The loss of employment land can be compensated with a commuted sum payment, which will be ring-fenced and used only for bringing forward the implementation of or upgrade of existing and planned employment sites. The sum should be equivalent to the replacement value of the gross area lost, calculated at serviced land value at the time of the decision. The District Valuer or equivalent Royal Institution of Chartered Surveyors qualified Valuer will arbitrate as needed on the agreed commuted sum. Legal agreements will be used to structure the payment of the commuted sum.

Summary of responses (including reasons) by planning authority:

Fife Spatial Strategy: Employment

Scottish Enterprise (1045): Support noted. Scottish Enterprise also seeks amendments
to the wording of the strategy to recognise the timescales it can take to bring forward strategic employment land allocations, and to protect against their development for alternative uses. Fife Council considers that there is some merit in the wording suggested by Scottish Enterprise; however the wording proposed is considered to be too detailed for the strategy of the plan, and would in any case be adequately covered by the provisions of Policy 5 (see below). Should the Reporter consider it appropriate to amend paragraph 13 of the strategy Fife Council recommends the following wording:

“The Fife Employment Land Strategy has identified sites across Fife for employment investment. These are included in this Plan to provide a sufficient land supply in Fife’s settlements. The development of strategic sites is important for long term economic growth and employment purposes, locally, regionally and nationally. Uncertainty over the delivery of strategic sites can undermine investor confidence, and can deter investment decisions, particularly in the current competitive economic circumstances. As certainty is essential to such investment decisions, the plan includes an *Employment Land and Property* policy to protect and safeguard employment land.

Fife Council invites the Reporter to make an appropriate recommendation on this issue.

Lawrence Bell (1265): Comments noted. Fife Council considers that jobs and housing need to be considered in combination.

Rob Thompson (1349): Whilst it is acknowledged that small businesses located in conservation areas of rural villages may face challenges particular circumstances, it is considered that this is a matter more specific than would be appropriate to include in the employment land strategy of the Local Development Plan. The potential for financial incentives is a matter that would most appropriately be dealt with outside the development plan process.

Policy 5: Employment Land

Scottish Enterprise (1052): Support and comments noted. Scottish Enterprise also seek amendments to the wording of the policy and supporting text to strengthen the policy in relation to the loss of employment land and provide additional detail as to how such applications would be assessed and determined. Fife Council considers that there is merit in the changes suggested by Scottish Enterprise. Fife Council invites the Reporter to make an appropriate recommendation on this issue.

SEPA (3285): Support for FIFEplan position and comments noted.

**Reporter’s conclusions:**

**Fife Spatial Strategy – Employment Land**

1. The proposed plan indicates that the employment land supply and distribution are a core part of its spatial strategy and support the Fife Economic Land Strategy. Scottish Planning Policy indicates that local development plans should allocate a range of sites for business, taking account of current market demand; location, size, quality and infrastructure requirements; whether sites are serviced or serviceable within 5 years; the potential for a mix of uses; their accessibility to transport networks by walking, cycling, and public transport and their integration with and access to existing transport.
2. The spatial strategy of the proposed plan covers both employment and housing land. It is important that these 2 uses of land, and other uses of land covered by the spatial strategy, are all considered together as this allows for the proper planning of an area, and the co-ordinated delivery of all development. Within this context, I consider that it would be inappropriate to put employment land and jobs before housing land and housing accommodation.

3. I acknowledge that small local businesses located in conservation areas of rural villages can face challenges, including installing shop fronts in keeping with their surroundings. However, section 64(1) of the 1997 Planning (Listed Buildings and Conservation Areas)(Scotland) Act requires that development proposals in conservation areas pay special attention to the desirability of preserving or enhancing the character or appearance of that area. This statutory requirement is reflected in other sections of the proposed plan, and requires to be applied to proposals from these businesses. While the representation also refers to possible initiatives, for example, introducing interest free loans and reducing business rates, such matters fall outwith the scope of this examination into the proposed plan. Additionally, I am not persuaded that it would be appropriate to insert a paragraph on such a specific issue in a section of the proposed plan which covers employment land much more generally and strategically.

4. The last 2 sentences in paragraph 12, page 12, of the proposed plan indicate that the area’s economic assets are being modernised through investment in business infrastructure, and provide examples of where this process has begun. An addition to the examples is proposed, which would refer to various remedial and other infrastructural works at Rosyth. In response to FIR 09, it was clarified that the works to improve the potential at Rosyth were ongoing and significant. In particular, they included the wider road connections associated with the new Forth Road Bridge (the Queensferry bridge), and land decontamination and reclamation, including removal of tanks and bunkers, and the rebuilding of the north quay wall. The council has now indicated that it agrees with this proposed change. I believe that this additional example includes important developments which significantly contribute to the modernisation of the economic assets of the plan area. In these circumstances, I believe that the additional text proposed in the representation should be inserted in the proposed plan.

5. Paragraph 13, page 12, of the plan refers to the sites identified for employment investment in the Fife Employment Land Strategy. It also indicates that these sites are included in the proposed plan, and that they are protected by policy to provide a sufficient land supply in Fife’s key towns. The council believes that there is some merit in adding text explaining the importance of strategic employment sites, and the need for certainty over their delivery, generally in line with the representation. However, it does not support the inclusion of text concerning how to deal with the loss of employment land identified in the employment land strategy to other uses. I agree that it is appropriate and helpful to refer, in general terms, to the importance and delivery of strategic sites in this paragraph because such sites are a key element of the overall spatial strategy for the plan area, which is the focus of this part of the proposed plan. Nonetheless, I consider it unnecessary to describe individual employment sites along the Fife Energy Corridor as strategic in the settlement plans, or to describe employment sites elsewhere in Fife as strategic, all as set out in Issue 2j – Other Policy Issues. The way in which the loss of employment land to other uses is approached is a more detailed matter, which is better dealt with in the section on Policy 5: Employment Land and Property. It is
therefore unnecessary to refer to this matter here. In these circumstances, I prefer the revised wording proposed for paragraph 13 by the council to the wording proposed in the representation.

6. Overall, adjustments to the proposed plan are required.

Policy 5: Employment Land and Property

7. One of the purposes of Policy 5 is to safeguard all existing employment areas, and those allocated in the proposed plan. The impacts of development proposals on existing employment uses on a site and neighbouring land are material considerations in assessing a planning application. Within this context, I believe that it is reasonable to ensure that such impacts are properly covered in the policy. It is therefore reasonable to refer to the site and neighbouring land in both criteria in the employment land part of the policy. The criteria set out the circumstances in which development for industrial or businesses uses will be supported.

8. Scottish Planning Policy indicates that new business sites should be identified where existing sites no longer meet current needs and market expectations. It also indicates that where existing sites are underused, reallocation to enable a wider range of viable business or alternative uses should be considered. Policy 5 of the proposed plan allows for the consideration of changes of uses from employment land in certain circumstances. I accept that care has to be exercised in allowing changes of use under this provision because it could introduce some uncertainty for proposed investment, which could detrimentally affect the supply of employment land. There may also be good reasons for such land not being developed. I therefore believe that it is appropriate to set out in the supporting text, at paragraph 6, page 208, of the proposed plan, more detail about the type of evidence that would be necessary to support a loss of employment land. Additionally, to help protect the quality and supply of employment land, particularly in key settlements, I consider that it is reasonable, in principle, to require any necessary replacement land to be appropriately located. However, I believe that the first reference to key agencies in the proposed text in paragraph 6 (first sentence) should be deleted because planning matters such as this are for the council to deal with, as planning authority, not key agencies. The council may decide to consult key agencies in coming to its final view.

9. Paragraph 7, page 208, of the proposed plan indicates that the loss of employment land can be compensated with a commuted sum payment. To provide clarity in the proposed plan regarding the use of any commuted sums raised, I consider that it would be helpful if it highlighted that the money will be ring fenced and used only to implement or upgrade existing and planned employment sites, as suggested in the representation.

10. Overall, adjustments to the proposed plan are required.

11. See also Issue 2j (Other Policy Issues) where further adjustments are recommended to Policy 5.
Reporters recommendations:

I recommend that the following modifications be made:

1. In the Employment Land section, paragraph 12, page 12, adjust the last sentence so that it reads:

   “…This process has already begun through the development of John Smith Business Park, the Energy Park, Fife, Fife Renewables Innovation Centre, and remedial and other infrastructure works at Rosyth (including the new Forth Road Crossing Bridge).”

2. In the Employment Land Section, paragraph 13, page 12, adjust the last sentence and add the following text so that the paragraph reads:

   “13. The Fife Employment Land Strategy has identified sites across Fife for employment investment. These are included in this Plan and protected by policy to provide a sufficient land supply in Fife’s key towns. The development of strategic sites is important for long term economic growth and employment purposes, locally, regionally and nationally. Uncertainty over the delivery of strategic sites can undermine investor confidence, and can deter investment decisions, particularly in the current economic circumstances. As certainty is essential to such investment decisions, the plan includes an Employment Land and Property policy to protect and safeguard employment land.”

3. In Policy 5 Employment Land and Property, page 207, adjust numbers 1 and 2 of the Employment Land part of the policy so that they read:

   “1. It is an employment use class consistent with existing or proposed employment activity on the site or neighbouring site; or
   2. It will not restrict the activities of existing or future businesses on the site or neighbouring employment sites.”

4. In the Applying Policy 5 section, paragraph 6, page 208, add the following text so that the paragraph reads:

   “6. In circumstances where a development would result in a net loss in employment land, and there is an overriding justification for that development which is supported by Policy 1 Part A2 (Development Principles), developers will be required to replace the lost employment land in an appropriate location to meet existing and future employment and business needs, as defined by Fife Council. In justifying the loss of employment land, applicants will be expected to demonstrate measures taken to seek the prior implementation of the employment allocation, including a minimum of 12 months marketing of the site through direct and internet methods and consultation with Fife Council and other key agencies, and they will be expected to provide evidence of infrastructural or other constraint which has restricted the implementation of the use and which will not be overcome in the short or medium term. The employment land supply will be monitored through Fife Council’s Employment Land Audit.”
5. In the Applying Policy 5 section, paragraph 7, page 208, add the following text to the first sentence so that it reads:

“7. The loss of employment land can be compensated with a commuted sum payment, which will be ring-fenced and used only for bringing forward the implementation, or upgrade, of existing and planned employment sites…”
## Issue 2e Town Centres

### Development plan reference:

Town Centres Strategy (page 12, paragraphs 15-17) and Policy 6: Town Centres First (pages 209 – 217)

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<td>Tina Chapman (5)</td>
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<td>D Wardrope (832)</td>
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<td>Scottish Natural Heritage (905)</td>
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<td>Hammerson (Kirkcaldy) Ltd (954)</td>
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<td>The Theatres Trust (960)</td>
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<td>Glenrothes Area Futures Group (1311)</td>
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<td>Carnegie Regeneration Ltd (1369)</td>
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<td>Threadneedle Property Investments (2950)</td>
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<td>Hammerson (Kirkcaldy) Ltd (957)</td>
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<td>Episo Boxes GP (3724)</td>
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<td>Glenrothes Area Futures Group (3900)</td>
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<td><strong>Town Centres</strong></td>
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<td>Tina Chapman (5): agrees that work needs to be done on re-energising town centres and bringing back aspects of business and living spaces to work beneficially. This work also needs to address the transport needs of villages in the vicinity. To achieve improvement there needs to be appropriate investment.</td>
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<td>D Wardrope (832): strongly agrees with the Plan’s commitment to supporting town centres.</td>
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<td>The Theatres Trust (960): supports the plans for strong town centres, including cultural uses as an important component of a vibrant town centre. A balance needs to be found between the main function of the town centre as a daytime shopping and employment destination, the available amenities for the residential population and the opportunities for people to enjoy an evening out. However, the Plan needs to carefully consider the compatibility of new uses, such as allowing residential uses in the town centre, with existing uses such as theatres, pubs, music venues and cinemas, which are vital for the health wellbeing of the local community but can result in potential noise issues. We...</td>
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recommend residential uses are not permitted in locations that surround existing community and cultural facilities.

Scottish Natural Heritage (905): welcomes the integrated approach taken to the future of town centres in Fife, which includes identifying the important role of green networks.

Glenrothes Area Futures Group (1311): highly endorses this definition of town centres and "The Town Centres First policy".

Iain Thomson (1946): enquires on what basis has the line between the primary shopping area and the secondary shopping area in Dunfermline Town centre been redrawn? He proposes either leaving the boundary as it is at present or more appropriately re-draw the line at the junction of High St and Guildhall St as clearly the entire lower end of the High St is now a secondary shopping area.

Royal London Asset Management (2015): No evidence base has been referred to despite the fact that the council has up to date evidence which has continually indicated that Fife loses out on a significant amount of retail spend. The council's retail capacity study indicates that there continues to be a significant amount of capacity for new comparison retail development in particular throughout Fife, but this shortage is not addressed at all in the LDP text on town centres. The plan is silent on retail needs and there is no positive spatial planning. There should be particular note that in the Dunfermline area there has been substantial retail leakage due to travel to work patterns south to Edinburgh.

SEPA (3298): supports the town centre first approach. It is important that a town centre approach does not exacerbate air quality and carbon emission issues and discourage the use of public transport; this should also be considered in the implementation of the plan. We therefore recommend improving access to town centres by public transport should be identified as a priority.

Hammerson (Kirkcaldy) Ltd (954): Support the allocation of proposal KDY 042 (expansion of the Fife Central Retail Park) for retail park expansion and support the identification of the site for additional non-food/bulky goods retailing development and also other non-retail uses. The site identifies that development may be possible after 2020. This confirms Hammerson (Kirkcaldy) Ltd.'s objections to Policy 6 which restricts retail uses in the Fife Central Retail Park to bulky goods/DIY and further expansion of the Fife Central Retail Park during the lifetime of the LDP (i.e. to 2026). The development requirements of the proposal (KDY042) should be amended to replace the reference to 'harming' with more appropriate text based on the SPP and the reference to '2020' should be deleted and replaced with reference to supporting development only when it is demonstrated that there is both retail capacity and the proposed development would not significantly adversely affect the vitality and viability of the town centre.

Carnegie Regeneration Ltd (1369): welcome allocation of DUN075 Carnegie Drive Retail Park (page 80) as part of Town Centre Strategy/Policy Framework, particularly the opportunity to introduce food retailing, improve the retail and customer offer and provide benefits to the town centre.

Threadneedle Property Investments (2950): welcome Proposed Development Opportunity (DUN075) (Page 80), to redevelop the Carnegie Drive Retail Park. The
town centre boundary should be extended to include the Retail Park enabling the City Centre to develop to the north with an opportunity to accommodate larger format Class 1 retail units. The expansion of the defined town centre to the north/east (encompassing the retail park, sheriff court and police station) is an opportunity for growth which can enhance the City Centre. Threadneedle Property Investments will commit capital expenditure to existing holding, to assist City Centre regeneration, if its planning profile can be improved. An attractive retail offer and prosperous City Centre will retain spend within Dunfermline and stop leakage to Edinburgh.

Policy 6: Town Centres First

Dalgety Bay & Hillend Community Council (77): is disappointed in the non-inclusion in the plan of their 2011 Town Centre Strategy.

Asda (693): support designation of their Hill Road (St Leonards) Dunfermline Store within the Local Shopping centre.

Asda (690): support the allocation of Halbeath Retail Park as a commercial centre but seek clarification on floorspace restrictions. Original legal agreement restricted amount of comparison goods to 2,330sqm with a clause of restriction that confirmed that the legal agreement would subsist for a period of 10 years (October 1998) after which time it would cease to be of effect. A subsequent application for an extension to the store placed no restrictions on floorspace other than to restrict overall level of gross floorspace.

Hammerson (Kirkcaldy) Ltd (957): have attached a supporting objection statement. Their objection primarily concerns the impact of the proposed policy on Hammerson’s interests at the Central Fife Retail Park (“CFRP”) located at Chapel, Kirkcaldy, the objection should be read in conjunction with attached Objection Statement which provides background; an overview of objections; summary of general approach to Policy 6; existing policy, economic and social context for the proposed retail policies and an overall statement of objections.

Hammerson have highlighted in the Statement numerous reasons for the objections to these proposed restrictions for types of retail goods floorspace. These reasons are summarised as follows:

- This limitation is contrary to the conditions for existing retail consents in either Phases 1 or 2 of the CFRP. It has been shown above that a wide range of retail floorspace is permitted within the areas covered by these consents.
- This restriction contradicts other aspects of the proposed LDP. In particular, it is contrary to the first part of Policy 6 which provides a criterion based approach for the determination of developments (including retail proposals) which attract large numbers of people and it is also contrary to aspects of Policy 6 which state that expansion of commercial centres, beyond existing consents, will not be supported during the lifetime of the plan. Policy 6 presents four different possibilities for retail development in commercial centres – (i) a criteria based approach that identifies what types of development proposals would be supported; (ii) a statement that only bulky goods/ DIY would be supported; (iii) a statement that bulky goods and limited non-food retail would be acceptable; and (iv) a statement that no expansion of commercial centres will be supported (irrespective of floorspace type). Policy 6 has been poorly considered and, as drafted, presents very muddled thinking about the
role of Commercial Centres.

- According to the Fife Retail Capacity Study there is no potential capacity for bulky goods/DIY floorspace in Mid Fife to 2022. If this advice is correct then the implied support for bulky goods/DIY at CFRP would be directly contrary to the statement on Page 209 (under heading “Outwith Town Centres”) that development proposals will address a retail deficiency.

- Notwithstanding inconsistencies and uncertainties regarding the wording of the Policy the overall thrust of the policy is to severely restrict new investment in retail and related floorspace in Commercial Centres including CFRP. The policy is not a town centres first policy (i.e. first before other locations) but a policy that prevents the consideration of investment in commercial centres. The policy appears to go further and actively seeks to remove retail floorspace from commercial centres.

- The policy is neither flexible nor realistic.

- The policy fails to recognise and accept the role of retail floorspace in commercial centres as complementary to that found in town centres.

- No evidence has been provided that demonstrates, in the case of CFRP at least, that the development of the CFRP has had significant impact on the vitality or viability of Kirkcaldy town centre (or other town centres). In contrast there is evidence that the town centre has been affected by wider changes in the structure of retailing which have also affected other locations including CFRP. There is, therefore, no evidence to justify the extreme policy approach in proposed Policy 6.

- The policy will undermine the significant economic, social and environmental benefits of the CFRP (and other commercial centres).

- The policy is contrary to the policy advice for town centres and retailing, and support for sustainable development and supporting sustainable economic growth set out in Scottish Planning Policy.

- The policy is contrary to the conclusions and analysis of the Fife Retail Capacity Studies undertaken for Fife Council.

- The proposed restrictions conflict with the allocation of site KDY042 (CFRP South) which is owned by Fife Council. Proposal KDY042 does not limit proposed new floorspace as an extension to the CFRP to bulky goods/DIY nor prevent any new floorspace and permits such new floorspace and other uses to be provided from 2020 onwards. This confirms that there is no justification by Fife Council to prevent development as proposed in Policy 6 within the CFRP.

Network Rail (1874): Policy 6 does not recognise that some attractions could be based on location-based natural or built features and/or locations outwith existing centres (i.e. proposed visitor centre at Forth Bridge). Given the wide range of natural and cultural features in Fife this approach may prevent reasonable consideration of emerging tourism and cultural development. It is suggested that the policy remain as it is but that the explanatory notes recognise the potential for emerging location based tourist/cultural/visitor developments.

Lassalle Investment Management Ltd (2096): seek changes to the wording of Policy 6, modifications sought are detailed below.

Legal & General UK Property Trust (2025): The specific objections to aspects of Policy 6 are:

- Objects to all references within Policy 6 to sequential ‘test’ as this does not reflect the provisions of the SPP.
Item 2 of Policy 6 requires development proposals to comply with the respective uses and roles of locations as shown in associated Figure 6.2 and Figure 6.4. Legal & General does not object to the proper, reasoned application of the sequential approach to any new proposals at Fife Leisure Park. However, the references to commercial centres in Figure 6.2 assume that all such proposals stand to undermine the role of town centres. Legal & General objects to this and to the suggested restriction on any new Class 1 or Class 3 floor space.

Figure 6.4(B) lists the acceptable uses in Commercial Centres. Legal & General envisages that its focus will remain firmly on Class 3, 7 and 11 uses but, as at present, with a limited element of Class 1 retail use. It is the view of Legal & General that a further element of Class 1 use could reasonably be located on the leisure park in order to provide local facilities for the adjoining new development areas.

This list of sequential preferences does not properly reflect those set out in Paragraph 68 of the SPP and should be amended accordingly. In particular, local centres should not be seen as a separate category and should not automatically be the preferred locations for the forms of retail and leisure development that are reasonably located in commercial centres.

At Item 4, the list also describes commercial centres as ‘out-of-centre’. Paragraph 68 of the SPP specifically notes commercial centres as the third preferred location for development (where identified in the development plan) and clearly separate from out-of-centre locations. The location preferences as currently set out in Policy 6 are therefore confusing and should be amended.

The third panel of Policy 6 on Page 209 of the LDP states that retail and leisure development with a gross floor space over 2,500sqm will require a retail impact analysis. While this might be appropriate for retail proposals it is clearly of no relevance to proposed new or reconfigures leisure developments. An amendment is required in order to make it clear that retail impact analysis does not apply to leisure development proposals.

The third panel of Policy 6 on Page 209 of the LDP states that the expansion of commercial centres beyond the limits of their current consents will not be supported. Legal & General object to this blanket exclusion of further development at Fife Leisure Park which appears to be directly contrary to Figure 6.4(B) where Use Classes 3, 7 and 11 are deemed to be acceptable. There is no sound, reason justification within the LDP for policies that could be used to inhibit the proper, active management of the asset including refurbishment and reconfiguration of the park or the provision of new floorspace.

Royal London Asset Management (2230): Object to policy 6 and in particular the statement that commercial centres should not expand beyond their current limits for the lifetime of the plan which is up to 2026. There should be an allowance in the plan for objective assessment of all retail proposals in accordance with the sequential approach to site selection. This policy embargo on potential expansion of commercial centres has no basis in national planning policy or in SESPlan and potentially supports out of centre retail development in non-allocated locations and unrelated to any form of centre above expansions to existing supported centres.

Policy 6 should make more detailed reference to the council's own Fife Retail Capacity Study 2012 (or updated report) which supports a large amount of new comparison retail development. The policy should allow developers to provide evidence and support for proposals to expand existing centres including commercial centres onto adjoining land in accordance with established criteria. The council should also explain in the policy where
it expects the established growth in comparison retailing to be accommodated and also to explain which other supporting services are to be promoted.

Bullet point 3 of policy 6 is not based on any national or strategic policy statement. Paragraph 10 on page 210 explains a policy approach which is not based on any empirical evidence in terms of the need to replace retailing in commercial centres with other uses and to 'migrate' this space to town centres. This paragraph is unfounded and should be deleted with encouragement instead given for continuing improvements to all centres in the commercial hierarchy.

Paragraph 11 should be deleted as it has no sound basis. All retail developments should have the ability to be assessed against objective criteria.

Figure 6.4A is unnecessary as it is a plan indicating the existing situation in the commercial centre. There is no need to have such a plan in the LDP which will be the development plan for at least the next ten years.

Dr Allen Armstrong (2200) - No mention is made of the secondary centres, such as Buckhaven/Methil; there is a need to promote continuing commercial use of the secondary centres to serve the population in the southern art of the Levenmouth conurbation.

Mr & Mrs M Westwater (2148): Support the increased protection being given to town centres. It would help if visions were identified for each of the town centres so that there was an aspirational goal developments should be contributing to. It would also help to link the network of town centres with the hierarchy's identified by SESplan and TAYplan which identifies Strategic Town Centres, Large town centres and small town centres.

The above average vacancy rates in the largest town centres and lack of investment therein must be addressed as a priority and we therefore support the use of frameworks and a restrictive planning policy to manage this; need to ensure the development of opportunities in town centres are prioritised all the more important as retail investments are likely to be more limited. Once the town centre frameworks are adopted the Council should be proactively working with the landowners of the development opportunities to ensure the sites are developed out.

As retailing changes other functions and uses need to be introduced into town centres to make them vibrant. Note caution on allowing non-commercial uses to locate with the zones identified as "Core retail areas" in town centres at ground floor level. Core areas should be preserved for core town centre uses (Classes 1, 2, 3 and 11) only, with areas beyond allowed to go to non-commercial uses. Retail parks will also be affected and Fife should be identifying how proposed changes of use in retail parks/commercial centres will be managed to ensure they themselves do not become town centres. There is also strong evidence to show the slow and steady decline of the town centres, which can be partially attributed to the growth and increasing successes and popularity of the out of town retail and leisure parks. Whilst this may be difficult to quantify it is clear that the diversion of trade to retail parks is not helping town centres and is challenging their position. A strong policy will be required to counter this, as it is clear that past retail policies have failed to provide appropriate protection to town centres.

Recommend adopting a similar approach to South Ayrshire’s Local Development Plan on restricting what uses can go to the retail park in Ayr. This is clearly worded and has
weathered challenge by developers at examination.

Scottish Government (3211): The first line of the policy sets out that town centres will be the first choice for uses likely to attract a large number of people. It lists some of these uses including ‘leisure’, the Scottish Government would request that this be clarified to refer to ‘commercial leisure’, for consistency with SPP.

Episo Boxes GP (3724): considers that the Council need to ensure that a strong development plan policy framework is in place which supports all of the key shopping destinations within the area in order for them to contribute to its attractiveness as a place to live, work and visit. There will be circumstances where it is not possible to accommodate all of these uses within town centres, and it should therefore be acknowledged that commercial centres can provide a suitable alternative in such instances.

Opportunities to enhance these locations and providing a complementary retail offer to the town centre is important for Glenrothes to help the settlement meet its potential, the needs of its sizeable population and the wider Council objectives for economic growth and new employment that the Local Development Plan aspires to deliver. These issues resonate strongly in light of prevailing economic conditions and Glenrothes must ensure it can be competitive in this new environment.

This also translates to other proposals for commercial leisure uses, where the delivery could significantly enhance the entertainment offer within the town and introduce more sustainable travel patterns for residents as a result. The Council are encouraged to recognise that allowing for a good retail and leisure offering at established retail locations within the Council area is an important component of this. The sequential test remains the key policy assessment to ensure these are located appropriately.

Episo Boxes GP (3724): looks forward to developing their proposals further in 2015, to invest and regenerate the Saltire Retail Park and enhance its credentials as a complementary retail/leisure destination that can better serve the needs of the Glenrothes population.

Lasalle Investment Management Ltd (2100): who own and manage the Kingdom Centre, Glenrothes on behalf of MARS Pension Trustees Ltd have the following comments to make:

- Glenrothes Settlement Proposal GLE 29 should not be unduly prescriptive or restrictive. Policy 6 should apply and a full range of uses appropriate to a town centre should be permitted.
- Uses in core retail areas should not be unduly restricted or limited and policy should encourage a range of uses to promote vitality and viability through day time and night time uses. In particular, Class 7 and Sui Generis Uses should be permitted as suitable within core retail areas.

Glenrothes Area Futures Group (3900): “Town Centres First” is a statement the GAFG totally agrees with. This is a template for town centres for all Scotland, and Fife Council must not only endorse it but ensure it is strictly adhered to.
### Modifications sought by those submitting representations:

#### Town Centres

The Theatres Trust (960): requests that the plan carefully considers the compatibility of new uses, such as allowing residential uses in the town centre, with existing uses such as theatres, pubs, music venues and cinemas, which are vital for the health wellbeing of the local community but can result in potential noise issues.

Iain Thomson (1946): seeks clarification on what basis has the line between the primary shopping area and the secondary shopping area in Dunfermline Town Centre been redrawn. The boundary should either be left as it is at present or more appropriately redrawn as the lower end of the High Street is now a secondary shopping area.

Royal London Asset Management (2015): request that the text should be altered to make it clear that an aim of the plan is to help to provide for retail needs locally in Fife to reduce the amount of leaked trade and to ensure that residents have access to the range of goods and services they need. Reference should be made to the council's Retail Capacity Study.

SEPA (3298): recommends improving access to town centres by public transport should be identified as a priority.

Hammerson (954): seeks a modification to the wording in the Kirkcaldy settlement plan under site KDY042 (page 120) to delete the words “…after 2020,…Centre” and replacement with “which would be supported only if it demonstrated that the proposal addresses either a quantitative or qualitative retail deficiency, that the proposed development will not have a significant adverse effect on the vitality or viability of existing town centres and that the proposed development satisfies the sequential approach”.

Threadneedle Property Investments (2950): seek an extension of Dunfermline town centre boundary to include (DUN 075) Carnegie Retail Park.

#### Policy 6: Town Centres First

Dalgety Bay & Hillend Community Council (77): seeks the inclusion of their 2011 Town Centre Strategy in the plan.

Asda (690): seek modifications to clarify floorspace restrictions in the Halbeath Retail Park.

Hammerson (Kirkcaldy) Ltd (957): seek the following modifications:

**Page 209: Policy 6: Town Centres First (Blue Box)**

Page 209 - Substitute “will benefit” with “Not have a significant adverse effect on the vitality and viability of town centres and the local economy”. It is appropriate for inclusion of an additional criterion to be met in this part of the Policy that is for a proposed development in any location outwith a defined town centre to help meet a qualitative and or quantitative retail deficiency; a further criterion should be included that states: “Helps to meet qualitative or quantitative deficiencies”.
Sequential Test - replace reference to the sequential test with sequential approach.

Sequence of Locations - Either the sequential “test” table should be more sophisticated comparable to that adopted by Aberdeen City or Local Centres should be removed from the listed of sequential centres.

Relevant Catchment Areas – Criterion 1 of Policy 6, Para 5 p210 and Figure 6.1 - All references to the “relevant catchment area” including that in the first blue box (criterion 1) on page 209, para 5 on page 210 and “Retail Catchment Zones” in Figure 6.1 should be removed. The location of centres in the network of centres in Figure 6.1 are helpful and there is no need to remove the figure completely – only the catchment zones shaded buff, blue and green should be removed. These should be replaced with references to the application of the sequential approach within the principal catchment area that would be served by the proposed development. However it would be reasonable to include reference to the need for the proposer of the developer to be able to provide appropriate evidence to demonstrate the catchment area that would be served by the proposal.

Para 6 Page 210 – Exceptions - Confirmation as to the meaning of the sentence beginning “Exceptions…” should be clarified. Hammerson reserves the right to provide further comment or objection subject to the clarification provided by Fife Council.

Uses and Roles of Network of Centres and Spatial Frameworks - The sentences beginning “The expansion of commercial centres…Development Plan” on page 209 and “The expansion of commercial centres….this Plan” should be deleted.

“Migration” of Retail Development Para 10 Page 210 - Confirmation as to the meaning of the sentence beginning “As opportunities arise… ” should be provided. Hammerson reserves the right to provide further comment or objection subject to the clarification provided by Fife Council. If no clarification and justification is provided that satisfactorily addresses all of the points raised above then this sentence should be removed.

“Equivalent Capacity” Para 10 Page 210 - Confirmation as to the meaning of “equivalent capacity” should be provided. Hammerson reserve the right to provide further comment or objection subject to the clarification provided by Fife Council. If no clarification and justification is provided then this reference should be removed.

New Development Limited to Bulky/DIY goods – Para 11 Page 210 - Paragraph 11 on page 210 should be deleted.

Role of Commercial Centres - Figure 6.2 - The second paragraph of the section “Role” for “Commercial Centres” in Figure 6.2 should be deleted. Policies and proposals for acceptable uses in Commercial Centres are set out in Figure 6.4B and other parts of Policy 6.

Figure 6.4A – Existing Uses – CFRP Page 214 - Figure 6.4A page 214 for the Central Fife Retail Park should be amended to accurately reflect the information provided above including the note regarding the date of this information and it’s potential to change.

Figure 6.4B – Acceptable Uses – CFRP Page 216 - References to restricting retail uses in the CFRP in Figure 6.4B should be removed and replaced with wording that recognises the existing restrictions set out in the extant planning consents that apply to
both phases of the retail park. Furthermore reference restricting Class 3 uses should also be deleted. If it is considered appropriate replacement wording could be “any proposals for other and complementary uses will be considered in terms of the impact that these will have on the overall character and function of the CFRP as a commercial centre that complements existing town centres” or similar.

Network Rail (1874): seek change to notes to add a clause at the end of sentence on page 210 as follows: Exceptions may be made where new development cannot be physically accommodated in a defined centre (town, local, or commercial) or the attraction is based on a specific geographic feature or location.

Lassalle Investment Management Ltd (2096): seek the following modifications:

- The word test in Policy 6 should be changed to “approach to site selection” to ensure consistency with SPP.
- Similarly the wording “The sequential test requires that locations are considered in the following sequence:” should be amended to read …… “The sequential approach to site selection requires that locations are considered in the following sequence:”
- Figure 6.3 – Thresholds for the application of the sequential test - should be deleted.
- Figure 6.5 should be amended to include a range of appropriate town centre uses in all defined town centres and core retail areas. These should encourage a range of appropriate ground floor town centre uses including Class 1 (Retail); Class 2 (Financial Services); Class 3 (Food and Drink); Class 7 (Hotels); Class 8 (Residential Institutions); Class 10 (Non Residential Institutions); Sui Generis (Public Houses and Hot Food Take Away), Class 11 (Assembly and Leisure).
- Uses in core retail areas should not be unduly restricted or limited and policy should encourage a range of uses to promote vitality and viability through day time and night time uses. In particular, Class 7 and Sui Generis Uses should be permitted as suitable within core retail areas.

Legal & General UK Property Trust (2025): seek the following:

Sequential Test - Change required: replace all references to the sequential ‘test’ with the sequential ‘approach’.

Role of Fife Leisure Park - Figure 6.2, Commercial Centres, delete the second paragraph and replace with ‘where new development and/or changes of use are proposed it will be for the promoter to demonstrate that proposals will not undermine the role of town centres’.

The wording of Figure 6.4(B) in relation to Fife Leisure Park should be amended to read ‘Use Classes 3, 7 and 11. New Class 1 uses may be supported where justified in order to provide facilities for the adjoining new development areas or where it addresses quantitative or qualitative deficiencies that cannot be met in a more central location’.

Preferred Locations - the sequence of locations to be taken into account in the application of the sequential approach as listed under Policy 6 should be amended to read:

- Town centres;
- Edge-of-town-centre;
- Commercial centres identified in the development plan; and
• Out-of-centre location that are, or can be made, easily accessible by a choice of transport modes’.

**Development proposals outwith Town Centres** - the wording of Policy 6 in relation to proposals ‘outwith town centres’ should be amended. In the first line of this section of the policy the words ‘and leisure’ should be deleted.

**The Ban on Expansion of Commercial Centres** - the wording of Policy 6 in relation to commercial centres should be amended after the words ‘current consents’ to read ‘will only be supported where the uses are complementary to the existing centre, where the proposals address a quantitative or qualitative deficiency and where it can be demonstrated that development will not undermine the vitality and viability of town centres’.

Royal London Asset Management (2230): seeks an allowance in the plan for objective assessment of all retail proposals in accordance with the sequential approach to site selection and removal of embargo on the expansion of commercial centres beyond their current limits for the lifetime of the plan which is up to 2026.

Policy 6 should be modified to make more detailed reference to the council’s own Fife Retail Capacity Study 2012 (or updated report) which supports a large amount of new comparison retail development. The council should also explain in the policy where it expects the established growth in comparison retailing to be accommodated and also to explain which other supporting services are to be promoted.

**Paragraph 10 on page 210** is unfounded and should be deleted with encouragement instead given for continuing improvements to all centres in the commercial hierarchy.

**Paragraph 11 on page 210** should be deleted as it has no sound basis.

**Figure 6.4A** is unnecessary and should be removed (page 213) as it is a plan indicating the existing situation in the commercial centre.

Dr Allen Armstrong (2200): seeks promotion of continuing commercial use of the secondary centres to serve the population in the southern art of the Levenmouth conurbation.

Mr & Mrs M Westwater (2148): request that visions be identified for each of the town centres so that there was an aspirational goal development which town centre should be contributing to and linkages provided of the network of town centres with the hierarchy’s identified by SESplan and TAYplan which identifies Strategic Town Centres, Large town centres and small town centres.

Recommend adopting a similar approach to South Ayrshire’s Local Development Plan on restricting what uses can go to the retail park in Ayr.

Scottish Government (3211): seek modifications on:

**Sequential test** - SPP paragraph 68 sets out the final location to be considered when planning for uses which generate significant footfall is “Out of centre locations that are, or can be, made easily accessible by a choice of transport modes”. Policy 6 does not make any reference to these types of locations. We would suggest these be added in as
a final point within the sequential approach as follows:
The sequential test requires that locations are considered in the following sequence:
1. Town centre (within defined boundary)
2. Edge of town centre
3. Local Centre
4. Out of Centre Commercial Centres identified in the Development Plan.
5. Out of Centre locations that are, or can be, made easily accessible by a choice of transport modes.

Paragraph 2 on page 210 - we would recommend that this paragraph be amended to include reference to wording on community, education and healthcare facilities in relation to the town centres first approach.

Paragraph 8 on page 210 sets out the requirement for Retail Impact Assessments, which fits with SPP. However, there is no reference to SPP’s other requirement (paragraph 71) that “Where a new public building or office with a gross floorspace over 2,500m2 is proposed outwith a town centre, and is contrary to the development plan, an assessment of the impact on the town centre should be carried out.” For clarity and consistency with SPP the Scottish Government would request that this section of the plan sets out this requirement.

Episo Boxes GP (3724): seek the following modifications:

Acknowledge the redevelopment proposals at the Saltire Centre and remove reference to alternative potential uses (i.e. housing) at paragraph 44, page 15 and Figure 6.4(B), page 216.

Promote a balanced network of centres and acknowledge the role of commercial centres to better reflect their importance within SPP at page 209 and paragraph 10, page 210.

Reflect the accurate Saltire Centre planning history and implemented permission relating to the sale of non-food goods across the units at Figure 6.4(A), page 213

Acknowledge the allowance for limited Class 3 use as part of the redevelopment proposals at Figure 6.4(B), page 216

Retain the support in principle for ancillary retail uses at paragraph 10, page 210

Lasalle Investment Management Ltd (2100): requests that the Glenrothes Settlement Proposal GLE 29 should not be unduly prescriptive or restrictive. Policy 6 should apply and a full range of uses appropriate to a town centre should be permitted. Uses in core retail areas should not be unduly restricted or limited and policy should encourage a range of uses to promote vitality and viability through day time and night time uses. In particular, Class 7 and Sui Generis Uses should be permitted as suitable within core retail areas.

Summary of responses (including reasons) by planning authority:

Overview to Council response

FIFEplan is guided by Policy 1 through which all applications will be judged to gain
approval; the policy principles set out in Policy 1 are all supported in Scottish Planning Policy (CD1). Policy 6 is a supporting policy which goes into more detail on issues associated with putting town centres first; as such it does not need references to issues such as design, environmental improvement, impact on amenity or the historic environment as these are covered under other supporting policies which are also linked back to Policy 1.

To support town centres Fife Council have identified clear frameworks which support core areas, while allowing flexibility in edge of centre locations to encourage a wider mix of uses. We have identified brownfield sites where retail development would be suitable and have removed planning obligations to assist with the viability of development proposals.

As with any approach that aims to put a specific focus on a location it must also have restraint when it comes to other locations that would lead to a negative impact on town centres. Therefore we have looked to restrict certain uses locating in out of town centre locations and have specifically set out criteria which will not allow for new out of town retail centres to be considered. We aim to honour existing consents but will look for all opportunities if these lapse to restrict future retail uses.

It is important this policy approach is set out in FIFEplan and that the Council does not have to re-justify this approach each time a speculative attempt is made to undermine it through applications that will draw trade away from town centres.

**Town Centres**

Tina Chapman (5); D Wardrope (832); Scottish Natural Heritage (905) and Carnegie Regeneration Ltd (1369): comments noted.

The Theatres Trust (960): FIFEplan has an overarching policy which includes a series of policy principles which all application must adhere to. One of the consequences of this policy is that the same criteria do not need to be repeated under each of the 14 supporting policies. Amenity is included under Policy 1 and has its own separate policy (Policy 10). Therefore all applications must address this issue and it does not need to be repeated under Policy 6 or any other policies. Policy 10 (Amenity) states that development will only be supported if it does not have a significant detrimental impact on the amenity of existing or proposed land uses. Development proposals must demonstrate that they will not lead to a significant detrimental impact on amenity in relation to noise, traffic movements etc. and any issues would be addressed at the detailed planning application stage.

Iain Thomson (1946): The core retail area maintains and enhances the predominant ground floor Class 1 retail offer on the pedestrianised section of the High Street and in the Kingsgate Shopping Centre. The role of the secondary shopping area is to compliment the core retail area by accommodating development that cannot be located there and prioritise reducing the number of vacant properties in this area; supporting a mix of non-retail uses, including food and drink outlets, offices, hotel, leisure uses and residential. A flexible transition from predominant retail uses is supported for the secondary shopping area allowing managed change. Given the existing uses within the lower end of the High Street secondary shopping is considered a more appropriate zoning.
Royal London Asset Management (2015): Fife Council commissioned CH2M Hill and Maria Francké Planning to prepare a Fife wide Retail Capacity Study (CD40). The study was required to assess the current convenience and comparison retail offer and to quantify the need for new floorspace. The study updates the development plan evidence base replacing the 2012 study (CD39) (as referenced in Policy 6 “outwith town centres”) and subsequent 2013 update. The scale of development will be assessed against the retail capacity study alongside the sequential test. While we will aim to reduce leakage this will be done within the context of the role Fife towns play in the wider SESpplan and TAYplan regions. The presence of retail leakage does not automatically equate to a desire to allow further retail development. While it is important that Fife’s town centres have a range of retail facilities to attract the local and wider population it has to be accepted that there will always be some leakage outwith Fife given the scale of Dundee and Edinburgh and their regional roles.

SEPA (3298): FIFEplan has an overarching policy which includes a series of policy principles which all applications must adhere to. A consequence of this policy is that the same criteria do not need to be repeated under each of the 14 supporting policies. Air Quality is included under the amenity policy (Policy 10) and is referenced under Policy 1. Therefore all applications must address this issue and it does not need to be repeated under Policy 6 or any other separate Local Development Plan policies.

Hammerson (Kirkcaldy) Ltd (954): The plan reflects the spirit of national policy by putting town centres first and encouraging retail developments to be located within town centres. The aim of Policy 6 is to protect retail floor space and maintain the retail presence that other uses would detract from this. In this case no change to the wording of KDY042 is proposed.

Threadneedle Property Investments (2950): With regards to the extension of Dunfermline Town Centre boundary to include Carnegie Retail Park, the Council is of the opinion that Carnegie Drive currently forms a strong physical and visual boundary to the northern edge of the designated town centre. In time, it may be that the town centre boundary requires to change to take in a larger area to allow for expansion, to reflect its role as one of Fife’s key town centres. However, this would require significant changes to Carnegie Drive to provide better connectivity between the town centre and the area to the north.

The planning profile of the retail park has been improved in the LDP with increased recognition of its relationship to the town centre and opportunities that can be provided for refurbishment and redevelopment of the retail park to bring it up to a modern standard. The edge of centre location provides additional opportunities for future development of the park and as such no modifications to the town centre boundary are proposed.

Policy 6: Town Centres First

Dalgety Bay & Hillend Community Council (77) – A framework has been produced for Dalgety Bay town centre which reflects the uses proposed within the Community Council’s Town Centre Strategy in a style that is consistent with the other frameworks in the Local Development Plan. The detailed framework also contains elements which are ambitious but not realistic enough to be achieved through the development plan process and therefore do not merit inclusion in the LDP.
Asda (690): refer to an existing planning consent and restrictions, however for Halbeath Retail Park, Figure 6.4(B) “Acceptable uses in commercial centres” (page 216) only states that beyond existing consents (pre-June 2014), acceptable uses are restricted to Class 1 – Bulky goods and limited non-food retail. New or further expansion of convenience (food) and fashion related retail will not be supported. Further development of Class 3 use will also be resisted. In this case the existing consent, if implemented stands and the wording of the LDP does not conflict with this.

Hammerson (Kirkcaldy) Ltd (957)

Page 209: Policy 6: Town Centres First (Blue Box) Page 209 - The rewording of Policy 6 section 1 from “will benefit” to “not have a significant adverse effect on the vitality and viability of town centres and the local economy” in not considered to accurately represent the aim of the policy to put town centres first and by allowing development that would have a negative impact on town centre would weaken the strategy of the plan.

Sequential Test – Fife Council considers that there is merit in the amended wording from sequential test to sequential approach and invites the Reporter to make an appropriate recommendation on this issue.

Sequence of Locations - The aims of both the Aberdeen approach and that in FIFEplan are essentially the same in that they look to set a context through which retail development will be directed to the most suitable location. The suitability or ability of a development proposal to be located in a town centre or local centre will come out through the sequential test and will take account of the scale of the proposal and the land available.

Over a certain size development will normally have a certain sphere of influence and this is the catchment area over which FIFEplan looks to development to justify both its need and proposed location. The Aberdeen approach looks to link up spheres of influence and suitable locations but by doing so comes up with a mechanism that is overly complicated. Given the similar aim of both approaches it is more pertinent to continue with the simpler one that is already included in FIFEplan and better reflects the approach in Scottish Planning Policy (CD1). It is therefore Fife Council’s position that no changes be made to the sequence of locations.

Relevant Catchment Areas (Criterion 1 of Policy 6, Para 5 p210 and Figure 6.1) - Mapping and references to relevant catchment areas are provided to highlight the importance of the sequential test and areas in which it will operate. The Council considers that application of the sequential approach at the three Fife retail market catchment areas of East Fife, Mid Fife and West Fife remains a relevant consideration. The three retail market catchment areas accord with the Fife Household Survey (NEMS, October 2009) (see supporting document SD1) and provide a useful indicator and benchmark when assessing potential leakage of food and non-food retail expenditure and addressing potential quantitative and qualitative deficiencies in retail provision from each catchment area.

Fife Council also produces a Fife Retail Capacity Study (FRCS) (CD40) which is updated regularly and quantifies the extent of expenditure leakage from Fife and the three sub market areas. It also quantifies the scope for additional retail floorspace for Fife and its three sub market areas. Any proposal for new retail development within one of Fife’s three sub market areas should make reference to the findings of the latest
Para 6 Page 210 (Exceptions) – The meaning of this sentence is to highlight that Fife Council will take into account the physical constraints placed on a development proposals when determining whether a proposal can be located within town or edge of centre.

The Council acknowledges that the catchment area (i.e. where shoppers will come from) for each and every particular retail proposal will vary, dependent upon a range of both i) the trading characteristics of the proposal such as its size, geographic location, accessibility, range of goods sold and ii) the existing and planned retail provision within and outside its identified catchment area. The application of the sequential approach allows an applicant to consider all suitable town centre and edge of centre sites first within the particular Fife retail market area and, if comprehensively assessed to be unsuitable for the proposal, to make a case for development on the proposed site. Assessment against the retail market level for the sequential approach will accordingly remain. This is further enabled through paragraph 6 (page 210) which states, “Exceptions may be made where new development cannot physically be accommodated in a defined centre (town, local or commercial).”

Uses and Roles of Network of Centres and Spatial Frameworks – It is reasonable to place restrictions on future expansion as this will allow focus to be placed on town centres. The Council stands by its approach to provide a strong focus on the town centre first principle, in accordance with SPP. To protect and enhance the role of town centres, the Council is not seeking to expand the limits of commercial centres during the life time of the Plan and is instead looking for opportunities to relocate retail development into town centres away from commercial centres, as opportunities arise to redevelop commercial centres for alternative uses. It is not considered that this approach will inhibit the redevelopment or reconfiguration of commercial centres or the provision of new floorspace (up to 10% net retail floorspace per unit) as stated in paragraph 10, page 210. The Council therefore considers that the suggested modifications are not consistent with the Council’s strategy and have therefore been rejected.

“Migration” of Retail Development Para 10 Page 210 – The Council recognises that commercial centres perform an important role in providing a complementary network of retail locations for particular goods types or trading formats which, historically, have been considered difficult to accommodate within Fife’s town centres. Fife’s four commercial centres have become an important focus for shopping and are distinct from town centres as their range of uses and physical structure makes them different in character and sense of place.

However, the range of uses currently permitted in these commercial centres and the growth in non-food sales and food stores is now recognised as attracting shoppers and trade away from town centre shops. As such, over the plan period, the focus of the Council is firmly on directing new retail development to existing town centres through application of Policy 6: Town Centres First and controlling the range of goods that can be sold at the commercial centres and limiting the amount of floorspace that can be used for the sale of non-food goods (up to 10% net retail floorspace per unit). This acknowledges the existing planning consents at the commercial centres and the range of goods that are currently permitted. The main aim for the Council is to support town centres by restricting the further expansion of retail floorspace over the plan period. It is however recognised that patterns of retailing do change and as such, this intention will
be monitored over the lifetime of the plan to establish whether any review is necessary.

The intention of the sentence, “As opportunities arise to redevelop existing commercial centres for other uses, the Council will seek to migrate retail development into town centres,” is for the Council to have the flexibility to sustainably redevelop existing commercial centres for other uses, should an opportunity arise. The Council is aware that the economic downturn has affected retail spending and opportunities may arise from a number of factors such as increasing numbers of vacant units at a commercial centre, a change in ownership, a strong shift in shopping habits towards existing town centres following which, there may be an opportunity to relocate remaining retail tenants into a town centre, should a commercial centre be struggling to remain viable. The Council considers that there is merit in the amended wording: “Should opportunities arise to redevelop existing commercial centres for other uses; the Council will seek to migrate retail development into town centres.” and invites the Reporter to make an appropriate recommendation on this issue.

“Equivalent Capacity” Para 10 Page 210 – The Council is referring to physical capacity and the actual quantum of proposed retail floorspace. Fife Council considers that there is merit in amending the wording to read: “Within out of town commercial centres, support for change of use, including incremental change, from bulky/DoIY floorspace to other comparison or convenience floorspace will only be supported where the equivalent quantum of retail floorspace cannot be located in a town centre or the proposal is for an ancillary retail use (up to 10% net retail floorspace per unit.) and invites the Reporter to make an appropriate recommendation on this issue.

New Development Limited to Bulky/DoIY goods – Para 11 Page 210 – The restriction should remain in place as it limits development such as food and drink moving out of town centres into commercial centres.

Role of Commercial Centres - Figure 6.2 – The Council considers that the purpose of Figure 6.2 is to clearly set out the respective roles of Fife’s town centres, local centres and commercial centres. Commentary on the different centres’ roles, functions and catchment characteristics, provide a clearer basis for their promotion as the Council’s preferred locations for retail and commercial leisure development. Figure 6.2 also reflects the need to protect Fife’s town centres from unacceptable trade diversion and impact which could undermine their vitality and viability, particularly from out-of-centre proposals. The Council agrees that the final sentence in Figure 6.2 is unnecessary in this context, as firm direction is already provided in Figure 6.4B. Accordingly, the Council agrees to delete the second paragraph and invites the Reporter to make an appropriate recommendation on this issue.

Figure 6.4A – Existing Uses – CFRP Page 214 – The restriction should remain in place as it limits development such as food and drink moving out of town centres into commercial centres.

Figure 6.4B – Acceptable Uses – CFRP Page 216 - The request to delete the reference restricting Class 3 uses is not supported as the Council considers that such an amendment is not consistent with the Council’s town centre first approach. The Council’s strategy seeks to direct new convenience (food) and comparison (fashion related) retail uses towards town centres. The Council therefore considers that the suggested modifications are not consistent with this strategy and have therefore been rejected. Accordingly, the objector’s suggestion for replacement wording is rejected.
Figure 6.4(B) “Acceptable uses in commercial centres” (page 216) only states that beyond existing consents (pre-June 2014), acceptable uses are restricted to Class 1 – Bulky goods and limited non-food retail. New or further expansion of convenience (food) and fashion related retail will not be supported. Further development of Class 3 use will not be supported. In this case the existing consent, if approved/implemented, stands.

Network Rail (1874): The Council intends to apply the sequential approach in accordance with paragraph 68 of SPP. In circumstances where a type of development is based on location, attraction or natural/built features, it should be justifiable against the requirements of the sequential test, if the attraction, feature or location is the most appropriate location for development to take place. Therefore the Council considers that it is not necessary to amend the wording.

Lassalle Investment Management Ltd (2096): Fife Council considers that there is merit in the amended wording from sequential test to sequential approach and further amending the wording in Policy 6 from “The sequential test requires that locations are considered in the following sequence” to read “The sequential approach to site selection requires that locations are considered in the following sequence”. The Reporter is invited to make an appropriate recommendation on this issue.

However, the Council are not agreeable to the request to delete Figure 6.3, the Council considers that its approach to apply thresholds for the application of the sequential approach is consistent with SPP. Paragraph 69 identifies that planning authorities should be realistic in applying the sequential approach to ensure that different uses are developed in the most appropriate locations and Para 73 identifies that in relation to out-of-centre locations, these should only be considered for uses which generate significant footfall where: ‘the scale of development proposed is appropriate, and it has been shown that the proposal cannot reasonably be altered or reduced in scale to allow it to be accommodated at a sequentially preferable location’. The Council considers that this supports the application of thresholds and therefore the Council rejects the request to remove Figure 6.3.

The Council considers that the provisions within Figure 6.5 clearly identifies the uses that would be supported within the town centre framework areas and specifically states what uses would be acceptable within the core retail area of these town centres. The Council therefore considers that no modifications are necessary.

The Council intends the core retail area to provide a strong focus on core retail uses with Use Classes 1, 2 and 3 particularly supported. However, Class 7 and Sui Generis uses are acceptable in locations adjacent to the core retail area in adjacent secondary shopping areas. As such, the Council does not consider and modifications to the approach are necessary.

Legal & General UK Property Trust (2025)

Sequential Test - Fife Council considers that there is merit in the amended wording from sequential test to sequential approach and invites the Reporter to make an appropriate recommendation on this issue.

Role of Fife Leisure Park - Restriction should remain in place as it limits development such as food and drink moving out of town centres into commercial centres and therefore do not support the rewording of the wording of Figure 6.4(B). These are uses
that we wish to retain within town centres and locating these uses within commercial
centres would undermine the Council’s Town Centres First policy.

The Council considers that the request to delete the second paragraph of Figure 6.2 in
relation to Commercial Centres and replace it with, ‘where new development and/or
changes of use are proposed it will be for the promoter to demonstrate that proposals
will not undermine the role of town centres’, is not consistent with the Council’s town
centre first approach for retail development, which is consistent with SPP. The Council’s
strategy seeks to direct new food and comparison retail uses towards town centres and
opportunities will be sought to relocate existing food and comparison retail uses away
from commercial centres, should the prospect arise to redevelop a commercial centre for
alternative uses. The Council therefore considers that the suggested modifications are
not consistent with the Council’s strategy and have therefore been rejected.

In response to the request for the wording of Figure 6.4(B) in relation to Fife Leisure
Park to be amended to read ‘Use Classes 3, 7 and 11. New Class 1 uses may be
supported where justified in order to provide facilities for the adjoining new development
areas or where it addresses quantitative or qualitative deficiencies that cannot be met in
a more central location’, the Council considers that such an amendment is again not
consistent with the Council’s town centre first approach as detailed above. The Council’s
strategy seeks to direct new food and comparison retail uses towards town centres and
as identified in Figure 6.4 (B) opportunities will be sought to relocate existing Class 1
uses away from commercial centres, should the prospect arise to redevelop a
commercial centre for alternative uses. The Council therefore considers that the
suggested modifications are not consistent with this strategy and have therefore been
rejected.

Preferred Locations – The council does not support any further out of centre locations.
Retail and leisure are supported within town centres by identifying key sites, providing
flexibility on uses and introducing exemptions to planning obligations in some areas.

Development proposals outwith Town Centres – With regard to the request for the first
sentence of Paragraph 8 to be amended by deleting ‘and leisure’, based on the
statement that ‘Retail Impact Assessments should not be applicable for leisure
development’, Paragraph 71 of SPP states, ‘Where a retail and leisure development with
a gross floorspace over 2,500m2 is proposed outwith a town centre, contrary to the
development plan, a retail impact analysis should be undertaken.’ As such, the
suggested modification is not consistent with SPP and has therefore been rejected by
the Council.

The Ban on Expansion of Commercial Centres – With respect to the request to amend
the wording of Policy 6 in relation to Commercial Centres after the words ‘current
consents’ to read, ‘will only be supported where the uses are complementary to the
existing centre, where the proposals address a quantitative or qualitative deficiency and
where it can be demonstrated that development will not undermine the vitality and
viability of town centres’, the Council stands by its approach to provide a strong focus on
the town centre first principle in accordance with SPP.

To protect and enhance the role of town centres the Council is not seeking to expand the
limits of commercial centres during the life time of the Plan and is instead looking for
opportunities to relocate retail development into town centres away from commercial
centres, as opportunities arise to redevelop commercial centres for alternative uses. It is
not considered that this approach will inhibit the refurbishment and reconfiguration of the park or the provision of new floorspace, as Use Classes 3, 7 and 11 are still in principle considered to be acceptable within the existing limits of the park. The Council therefore considers that the suggested modifications are not consistent with the Council’s strategy and have therefore been rejected.

Royal London Asset Management (2230) - The Council acknowledges that the Plan does not reference the latest version of the Retail Capacity Study (CD40) or make specific reference to its conclusions. However, the Council considers that the Retail Capacity Study is a ‘fluid’ document which is regularly updated to reflect the latest retail capacity position and retail needs. As such, the Council does not consider it is appropriate for a 10 year plan to be based on current retail conditions and has instead developed a policy which is capable of addressing changing retail needs over the entire Plan period. Therefore, the Council does not consider the suggested modifications are necessary.

In relation to the restriction on commercial centres expanding beyond their current limits during the lifetime of the plan, the Council stands by its approach to provide a strong focus on the town centre first principle, in accordance with SPP. To protect and enhance the role of town centres, the Council is not seeking to expand the limits of commercial centres during the life time of the Plan and is instead looking for opportunities to relocate retail development into town centres away from commercial centres, should opportunities arise to redevelop commercial centres for alternative uses. It is not considered that this approach will inhibit the redevelopment or reconfiguration of commercial centres or the provision of new floorspace, as Use Classes 3, 7 and 11 are still in principle considered to be acceptable within the existing limits of the park. The Council therefore considers that the suggested modifications are not consistent with the Council’s strategy and have therefore been rejected.

The representation states that the policy approach has no basis in national planning policy or in SESPlan and should include an allowance for objective assessment of all retail proposals in accordance with the sequential approach. The Council disagrees with this statement. The town centre first approach and sequential approach proposed by the Council is consistent with SPP and SESPlan Policy 3, which identify how local development plans should plan for town centres and retail development and promote a sequential approach.

With regards to the statement that the policy embargo on potential expansion of commercial centres potentially supports out of centre retail development in non-allocated locations, the Council does not consider this to be correct and all retail and commercial leisure proposals which meet or exceed the criteria set out in Figure 6.3, will be required to apply the sequential approach as set out in Policy 6.

With regards to the request that more detailed reference should be made to the Fife Retail Capacity Study 2012 (or updated report), the Council acknowledges this request and will seek to include reference to the latest version of the study.

With respect to the statement that the LDP should plan positively for retail growth and allow developers to provide evidence and support for proposals to expand existing centres including commercial centres onto adjoining land in accordance with established criteria, the Council considers that this would conflict with the Council’s approach, which is seeking to prioritise, protect and enhance the role of town centres. Figure 6.2
provides a clear justification and identification of the role each type of centre will have as part of the Council’s retail strategy.

Further, paragraph 2 clearly identifies that town centres are to provide the focus for future retail, office, commercial leisure, entertainment, recreation, cultural and community facilities, as well as homes and businesses, healthcare and education facilities, whilst paragraph 11 identifies the role of commercial centres within the strategy as supporting more appropriate out of centre uses including bulky/DIY comparison goods and commercial leisure. As such, the suggested modifications are not consistent with the Council’s strategy and have therefore been rejected.

With regard to the statement that the policy should clarify where it expects the established growth in comparison retailing to be accommodated and explain which other supporting services are to be promoted alongside new housing development, Figures 6.4 and 6.5 clearly detail the types of uses that will be considered acceptable. Therefore the Council considers no modifications are considered necessary.

The representation states that bullet point 3 of Policy 6 is not based on any national or strategic policy statement and the policy should not require all retail development to positively benefit town centres but should instead be judged on the significance of both its positive and negative effects. The Council acknowledges the point made. Paragraph 70 of SPP states that, ‘The impact of new development on the character and amenity of town centres, local centres and high streets will be a material consideration in decision making. The aim is to recognise and prioritise the importance of town centres and encourage a mix of developments which support their vibrancy, vitality and viability.’ As such the Council considers there is merit in amending the wording from ‘benefit’ to ‘support’ to reflect the terminology within SPP and to ensure consistency of approach and invites the Reporter to make an appropriate recommendation on this issue.

Paragraph 10 on page 210 - The Council is not seeking to prevent the improvement or redevelopment within commercial centres, but is seeking to restrict further expansion and the provision of uses which would further undermine the vitality and viability of town centres. The suggested modifications have therefore been rejected.

Paragraph 11 on page 210 - The Council is seeking to prioritise, protect and enhance the role of town centres and as part of this strategy it has identified a clear justification and identification of the role each type of centre will have as part of the Council’s retail strategy. To maintain and enhance the viability of the town centres the Council considers that it is necessary to provide this clear distinction between the role of town centres, local centres and commercial centres, as defined in Figure 6.2 and the preceding paragraphs on page 210. The Council considers that to provide this clear distinction between the role of town centres and commercial centres, that commercial centres should support more appropriate out of centre uses including bulky/DIY comparison goods and commercial leisure. The need to define such roles is supported by Policy 3 of the SESplan. As such, the suggested modifications are not consistent with the Council’s strategy and have therefore been rejected.

Figure 6.4A (page 213) is reflective of the acceptable uses as identified within Figure 6.4 (B) and as such should be retained. RLAM has stated that the adopted 2012 Dunfermline and West Local Plan identified an expansion to Halbeath Retail Park and that a PAN notice was lodged by the owner of the retail park promoting its extension, for which a planning application will be lodged shortly, and there is no justification provided...
for deleting this reference and placing an embargo on any future expansion. The Council cannot base the plan on potential future applications and as such the suggested modifications have been rejected.

Dr Allen Armstrong (2200): Figure 6.5 “Acceptable uses in town centre framework area” (page 217) details acceptable uses for the Leven area including secondary shopping areas.

Mr & Mrs M Westwater (2148): The word “vision” does not fit with the style of the plan which looks to identify issues more fitting with development management requirements. Where required plans for individual town centres will be developed through the life of the plan working in partnership with other Council Services and external partners and organisations.

The approach adopted by South Ayrshire provides a level of detail not suitable for the Local Development Plan, particularly when we have moved to one which focuses on policy principles rather than discussions of the background to policy approaches. Information of this type would be better placed in town centre action plans which are produced by separate parts of the Council.

Rather than adopt a blanket approach Fife Council has detailed acceptable uses in individual commercial centres (Figure 6.4(B) - page 216). The expansion of commercial centres beyond the current limits of their consents will not be supported during the lifetime of this Plan. As opportunities arise to develop existing commercial centres for other uses, the Council will seek to migrate retail development into town centres. Within out-of-centre commercial centres, support for change of use, including incremental change, from bulky/DIY floorspace to other comparison or convenience floorspace will only be supported where the equivalent capacity cannot be located in a town centre or the proposal is for an ancillary retail use (up to 10% net retail floorspace per unit).

Policy 6 sets out the Council’s approach for core retail areas, which identifies that changes to non-commercial use of existing ground floor commercial uses will not be supported. However, beyond the core retail areas, the Council will accept a change of use from retail uses where it can be demonstrated that active marketing has failed to find a retail use. Within core retail areas, premises must have been vacant for more than two years.

Scottish Government (3211)

**Sequential Test -** The council does not support any further out of centre locations. As stated in the overview above, FIFEplan has put forward a strong framework that will support town centres by identifying sites, providing flexibility in edge of centre locations and removing planning obligations in these locations. Due to this pro town centre approach we have taken the policy decision that no new out of centre retail development would be seen as acceptable. We accept that a criteria covering out of centre locations is included in SPP but believe that the approach taken by the Council merits the non-inclusion of the bullet point.

Paragraph 2 on page 210 –Paragraph 2 already states, ‘Fife Council will put town centres first and make them the first choice for a mix of uses including retail, offices, leisure, entertainment, recreation, cultural and community facilities, as well as homes and businesses, healthcare and education facilities.’ As such, no modifications are
Paragraph 8 on page 210 – Fife Council considers that there is merit in the amended wording in line with SPP requirements and invites the Reporter to make an appropriate recommendation on this issue.

Episo Boxes GP (3724)

The Council notes the existing owner’s intention to invest and regenerate the Saltire Retail Park and enhance its credentials as a complementary retail/leisure destination that can better serve the needs of the Glenrothes population. The Council acknowledges the pre-application discussions held in 2014. However, the fact that development has not taken place at the Saltire Retail Park adds weight to the Council’s concerns regarding the suitability and deliverability of this site for further retail development.

The wording within Figure 6.4 (B) increases flexibility should the existing redevelopment of the retail park not come forward in the lifetime of the plan. The policy enables the relocation of existing retail uses to the town centre or edge of centre, aiming to allow scope for a range of development opportunities to be explored that improves place making and creates attractive environments. Whilst Fife Council seek to maintain a degree of flexibility in future uses for the commercial centre it considers that there is merit in removing the last 2 sentences of paragraph 44 (page 15) and replacing them with the following text so that it corresponds with the text in Figure 6.4 (B):

“The Council will explore the potential for comprehensive redevelopment of this centre if the retail uses can be successfully relocated to the town centre or edge of centre”.

In respect of Figures 6.4 (A+B) the Council notes the 2004 consent for the redevelopment of the Saltire Retail Park which was implemented in part in 2010. It is the Council’s opinion that this supersedes previous unit specific consents and that a use restriction of durable/non-food retail and non-food retail warehousing (as set out under Condition No. 5 of the 2004 planning consent (Reference: 04/03826/COPP) (See supporting document SD2) is now in place across the retail park. Fife Council is therefore minded to revise the diagram in Figure 6.4 (A) along with the text in Figure 6.4 (B). The reference in Figure 6.4 (B) to ‘Class 3 uses will not be supported’ will remain, however the text will be amended to reflect the extant consent of 2004 which allowed for a single hot food takeaway (Sui Generis Use) and invites the Reporter to make an appropriate recommendation on this issue.

Lasalle Investment Management Ltd (2100) – With regards to the request that uses in core retail areas should not be unduly restricted, the Council intends the core retail area to provide a strong focus on core retail uses with Use Classes 1, 2 and 3 particularly supported. However, Class 7 and Sui Generis uses are acceptable in locations adjacent to the core retail area in adjacent secondary shopping areas. As such, the Council does not consider and modifications to the approach are necessary.

Glenrothes Area Futures Group (GAFG) (3900) – note support for Policy 6.
**Reporter's conclusions:**

### Town centre issues: transport and infrastructure

1. The council has not made a particular response to the representation from Tina Chapman who seeks links between town centres and surrounding villages including good bus services and adequate car parking. Insofar as this is an unresolved matter, I have taken note of Policy 1, Development Principles, and Policy 3, Infrastructure and Services, which seek to ensure that development is supported by the necessary infrastructure.

2. I further note Table S2, Policy Context of the Local Development Plan, indicates a link with the Regional Transport Strategy. Finally, I have noted the section dealing with town centres within the spatial strategy. All-in-all, I am satisfied the proposed plan has taken an holistic approach to town centre development and that the matters raised in respect of infrastructure have been addressed insofar as being within the scope of the document.

3. In response to the concern about air quality in town centres, other policies in the proposed plan again ensure that this issue is considered as part of the development management process. I agree with the Scottish Environment Protection Agency that the optimisation of public transport use would assist in the protection of air quality. However, as indicated above, I consider the spatial strategy demonstrates an awareness of the wider importance of controlling emissions. This objective is supported through specific polices in the proposed plan (Policies 1 and 14) and there is no requirement to modify Policy 6 in this respect.

### Town centre issues: residential compatibility

4. In town centres the spatial strategy seeks to achieve “a better mix of uses and activity – and not just during the normal business day.” The supporting text for Policy 6 indicates: “Where appropriate, the council will also encourage investment in the evening economy.” The Theatres Trust supports this general approach but expresses caution about the prospect of allowing further residential use within town centres.

5. The spatial strategy recognises the importance of town centres being attractive as places in which to live and points out that FIFEplan strategy supports people having homes in and close to town centres. The text attached to Policy 6 also supports the principle of residential development in town centres.

6. Indeed, the principle of living in town centres is long-established and I agree that residential development within centres is an essential element in securing the vitality that makes such areas attractive. Clearly, other evening and night-time activities in town centres may not be conducive to residential amenity. However, the proposed plan includes policies to guide development management and I am satisfied these policies are adequate to ensure that proposals for new town centre development and any resultant impacts on amenity, including residential amenity, can be appropriately assessed. Whilst proposed new housing may well not be suitable in the proximity of certain existing town centre uses, examples of which are referred to by The Theatres Trust, I do not believe it is necessary to impose a policy restriction on residential development.
7. It has been suggested that the proposed plan does not include any positive spatial planning for retail development to take account of the continuing trade diversion (“leakage”), especially to Edinburgh from the Dunfermline area.

8. I note the council commissioned a retail capacity study in 2012, the findings of which informed the proposed plan. A further capacity study was commissioned and published in 2014 and so it is clear that the council is endeavouring to ensure that retail planning takes account of up-to-date information.

9. The most recent study finds that there is no requirement for additional convenience floorspace in either East Fife or West Fife although in Mid-Fife a notional £6.09 million of expenditure will be available by 2024. Insofar as comparison goods are concerned, additional floorspace in town centres in both East Fife and West Fife could accommodate increased demand up to 2024 but there is no anticipated requirement in Mid-Fife. On this basis, I consider that Policy 6, Town Centres First, is drafted in a manner that meets the circumstances envisaged in the retail capacity studies.

10. Insofar as retail development proposals may come forward for locations not within town centres, the plan indicates it will be necessary to demonstrate that a deficiency in the quality and quantity of retail floorspace is being addressed. In this respect, an assessment should be undertaken against the latest capacity study.

11. The council believes that there will be an inevitable element of leakage to Edinburgh and Dundee. I think this is a pragmatic outlook in recognition of the regional roles played by these centres. Nevertheless, all-in-all, I do not consider Policy 6 to be deficient in terms of any spatial planning requirements to address “leakage”. Equally, I think the policy provides a reasonable basis for securing a range of retail facilities to meet the forecast demand to 2024.

12. In reaching the foregoing conclusion, I have noted the suggestion that Policy 6 should indicate where growth in retailing and supporting services is to be promoted to support the level of housing development that the proposed plan anticipates. However, taking into account the terms of the 2014 retail capacity study, I believe the general approach of Policy 6 is sufficiently adaptable to accommodate any demands that residential growth may generate.

Policy 6: basis

13. I have noted the representations relating to the nature of Policy 6, and its ability to cope with dynamic retail techniques, including internet retailing, and the incremental cumulative impact of retail parks. However, I do not believe the proposed plan should be required to adopt similar approaches to those contained in other local development plans including those to which reference is made. I am satisfied that the policy provides the basis for development management within the area of the proposed plan especially when assessment is undertaken in conjunction with current retail capacity information. Furthermore, the proposed preparation of plans for individual town centres through a partnership process should provide a further understanding of the ongoing and changing needs and requirements of particular settlements.
Policy 6: introductory paragraph

14. Whilst I recognise that Scottish Planning Policy refers to “commercial leisure” in the context of town centres, I do not believe it is necessary to include this term in the introductory paragraph which adequately describes the range of uses to be found in a town centre. These include “leisure” in general and, in turn, this could involve either a commercial leisure project or non-commercial leisure activities. Both could attract large numbers of people. Accordingly, the modification suggested by the Scottish Government is not required. (It should be noted that although the council refers to this issue in the summary of representations there is no formal response).

Policy 6: sequential test

15. Scottish Planning Policy indicates that development plans should adopt a sequential town centre first “approach” and I accept that this terminology could replace references in the proposed plan to a sequential “test”. To some extent, the terms are interchangeable as “the sequential test” describes the process set out in applying “the sequential approach”.

16. In accordance with Scottish Planning Policy, it would be appropriate to include an additional reference to large new public buildings or offices proposed outwith town centres contrary to the provisions of the proposed plan.

Policy 6: section 1 – catchment areas

17. I recognise that retail proposals may exert influence beyond the boundary of a single catchment area or, alternatively, have a local impact that does not extend across an entire catchment area. However, the retail capacity studies prepared on behalf of the council identify three retail catchment areas within Fife (referred to as “zones” in Figure 6.1) and these form the basis for floorspace assessment. I therefore consider that the three retail catchment areas have a part to play in the assessment of retail development proposals. However, it would be preferable for the policy to “take into account” the catchment areas. The sequential approach could then be applied and proposed retail developments could be assessed in a flexible and realistic manner in accordance with the guidance in Scottish Planning Policy.

18. To reflect this conclusion, section 1 of Policy 6 should be adjusted, along with paragraph 5 in the supporting text.

Policy 6: section 3 – effect on vitality and viability

19. I agree with the concern expressed in respect of requiring development proposals to “benefit” the vitality and viability of town centres. It would be preferable for the policy to reflect Scottish Planning Policy and ensure there would be “no significant adverse effect” on vitality and viability. This would be a more appropriate modification than that suggested by the council and, in my opinion, would not prejudice the “town centres first” objectives.

Policy 6: additional section – meeting qualitative or quantitative deficiencies

20. I do not accept the necessity for a section to be added in respect of meeting qualitative or quantitative deficiencies. I believe that the section of the policy dealing
with proposals “Outwith town centres” provides adequate guidance. The assessment against the retail capacity study would relate to retail floorspace whilst other aspects of any particular development would be subject to standard development management procedures. This process would also have regard to the wider policies of the proposed plan. As explained, the council maintains up-to-date statistics through regular revisions of the retail capacity study and I have no reason to believe the documents have limited reliability.

Policy 6: sequence of locations

21. Scottish Planning Policy is clear in specifying the order of preference in which locations are to be considered under the sequential approach. Local centres are included in the order of assessment. As indicated in Figure 6.2 of the proposed plan, local centres are small town or village and neighbourhood centres serving local population centres. Despite the smaller scale of local centres, they are nevertheless important and I consider that local centres should remain as part of the sequential approach in the proposed plan. No change to Policy 6 is required.

22. I recognise that the council does not support any further out-of-centre locations but, nevertheless, the policy must indicate the order of preference in which any such proposals would be assessed under the sequential approach. In this respect, the change suggested by Royal London Asset Management, EPISO Boxes GP, and the Scottish Government reflects the guidance contained in Scottish Planning Policy. In particular, I believe “Out-of Centre Commercial Centres” should be termed “Other Commercial Centres”. In turn, I accept that Policy 6 should be amended in this respect. (The representation by the Scottish Government in this respect is summarised in the “Modifications sought…” section).

Policy 6: development proposals “Outwith town centres”

23. Proposals for retail and leisure development with a gross floorspace 2,500 square metres in an out-of-centre location, on the face of the matter, would be contrary to the “town centres first” policy of the proposed plan. Accordingly, in terms of Scottish Planning Policy, a retail impact analysis should be undertaken. This requirement is therefore correctly stipulated in Policy 6.

Policy 6: commercial centres: expansion restrictions

24. The council emphasises the policy objective of supporting town centres. Indeed, it is envisaged this could involve diverting retail activities from existing commercial centres and relocating these in town centres. In theory, this would permit the redevelopment of commercial centres and, argues the council, justifies the policy restriction on the expansion of those centres. It is clear that the wider thrust of the policy accords with the guidance in Scottish Planning Policy in recognising the importance of town centres as a key element of the economic and social fabric of communities. However, in pragmatic terms, I have noted the situation at Halbeath Retail Park where many of the tenants are on long-term leases. There are also indications of development intentions at other commercial centres. This undoubtedly limits the potential for redevelopment involving other uses.

25. The alternative wording suggested by the council also represents a more pragmatic approach. Although the likelihood of the existing commercial centres being proposed for
other uses appears to be remote, especially within the life-time of the proposed plan, an aspiration to transfer existing retail uses to town centres is not unreasonable.

26. On the other hand, I do not consider the stated policy embargo on the expansion of commercial centres to be reasonable. A policy to this effect is neither justified nor necessary to secure the “town centres first” objectives. It also removes the opportunity to consider any proposed expansion of a commercial centre in the context of the sequential approach.

27. Whilst the council states it does not support the expansion of commercial centres beyond the limits of current consents, any proposal for an expansion to an existing commercial centre would require assessment on the basis of the sequential approach. By their nature, commercial centres are “outwith town centres” and therefore follow town centre and edge-of-town-centre sites in order of preference. As indicated in the policy, any retail and leisure development with a gross floorspace of over 2,500 square metres would require a retail impact analysis. Significantly, it would be necessary to address any deficiency against the most recent retail capacity study.

28. In this latter respect, it is also significant that the council regularly updates the retail capacity for Fife. As explained above, the 2012 study was reviewed in 2014. I therefore conclude that the section of the policy dealing with proposed development “Outwith town centres” provides an adequate basis for the development management of proposals that would involve the expansion of existing commercial centres. In addition to a retail impact analysis where required, it would be for developers to provide such other supporting information as was thought appropriate.

29. Insofar as the section dealing with “commercial centres” is concerned, acceptable uses are specified in Figure 6.4(B) and other development management considerations are referred to elsewhere in Policy 6. Accordingly, this section of the policy should be restricted to indicating Table 6.4(B) as being the guide to acceptable uses.

30. Paragraph 10 of the supporting text should be modified accordingly. The modification should include clarification of the reference to “equivalent capacity”.

**Applying Policy 6: town centres and policy frameworks**

31. I consider that paragraph 2 makes adequate reference to community, education and healthcare facilities. (This representation by the Scottish Government is summarised in the “Modifications sought…” section).

**Applying Policy 6: specific locational requirements**

32. I recognise there may be circumstances when a development suited to a town centre may be faced with difficulties because of lack of accommodation. Alternatively, specific locational requirements may, on occasion, justifiably dictate a location that is not within a town centre. On this basis, in addition to paragraph 6 indicating that there may be exceptions in terms of physical accommodation, reference to circumstances where there is a compelling need to comply with geographic limitations should be included. A short addition to the sentence, similar to that suggested by Network Rail, would suffice. Beyond this there is no further need for clarification.
Applying Policy 6: out-of-town commercial centres – changes of use

33. I believe the council is entitled to state a general principle of restricting changes of use in out-of-town commercial centres. This is not an unqualified embargo as an assessment against town centre floorspace capacity is also indicated along with the potential for up to 10% net retail floorspace per unit. In any event, Figure 6.4(B) provides guidance for each of the four centres, recognising the terms of planning permissions that have been issued.

Applying Policy 6: public buildings

34. I agree with the council’s acceptance of the suggestion by the Scottish Government in respect of making a reference to new public buildings in paragraph 8. (This representation is summarised in the “Modifications sought …” section.)

Figure 6.2: roles of town centres, local centres and commercial centres

35. The final paragraph of the “Commercial Centres” section should be deleted in its current form and simply indicate that the appropriate guidance is found in Figure 6.4(B).

Figure 6.3: thresholds

36. The specification of threshold sizes for various use classes provides potential developers with an indication of whether or not a particular proposal will be subject to sequential assessment. In turn, this provides the opportunity to prepare information in support of a development proposal. The inclusion of thresholds in Figure 6.3 does not remove the prospect of a proposal being assessed on merit. Neither should the thresholds be regarded as rigid limits as, in terms of Scottish Planning Policy, planning authorities should be flexible and realistic in applying the sequential approach. This, says the guidance, should ensure that different uses are developed in the most appropriate locations.

37. On the foregoing basis, I conclude that Figure 6.3 should not be deleted but should remain as a guiding factor in the council’s approach to development management.

Figure 6.4(A), Halbeith Retail Park

38. The three maps of retail parks illustrated in Figure 6.4(A) are a useful complement to the town centre frameworks contained in the settlement plans. Subject to the modifications discussed below, including those at Halbeith Retail Park, I do not believe that justification has been provided for the deletion of Figure 6.4(A).

39. Insofar as the proposed expansion of Halbeath Retail Park is concerned, the council is entitled to remove the allocation for expansion previously identified in the Dunfermline and West Local Plan as part of this local development plan review. I accept that the removal of the allocation supports the “town centres first” approach. However, should the development of that area be proposed in the future, the basis for assessment is established in Policy 6.

Figure 6.4(A), Saltire Centre, and Figure 6.4(B), Saltire Retail Park, Glenrothes

40. The council has submitted a revised plan showing all the units within the Saltire
Centre to be available for “Durable/non-food retail and Non-food retail warehousing”. The key also indicates that the commercial centre includes a “proposed single hot food takeaway (Sui Generis Use)”. Revised Figure 6.4(A) appears to reflect the terms of the planning permissions relating to the site and the plan should therefore replace the existing plan.

41. The council has also submitted revised text to advise on acceptable uses at Saltire Retail Park. The uses seem to reflect the planning permission status and include a reference to the approved hot food takeaway development. This is in accordance with the requirements of EPISO Boxes GP. I have adjusted the guidance to refer to future uses acceptable to the council as any use already granted planning permission clearly does not require further approval. Although EPISO has indicated that a small number of Class 3 uses are intended for the Saltire centre, any forthcoming proposals will require to be assessed against the guidance in Figure 6.4(B). In respect of such uses, I believe it is appropriate for the guidance to express the council’s views with reference, as required by EPISCO, to the single approved Class 3 outlet.

42. Insofar as the possibility of the redevelopment of the Saltire Retail Park is concerned, the guidance should be amended in accordance with other related modifications and it should be made clear that potential in this respect will only be explored should the opportunity arise. (See also Issue 3c).

Figure 6.5: acceptable uses

43. Figure 6.5 provides an indication that certain uses would be acceptable within the various town centre framework areas. I can accept that these uses have been specified to provide a strong focus on core retail uses and I support this approach to town centre development. In itself, I do not consider that the application of the policy could be regarded as unduly restrictive but, in any event, Figure 6.5 does not state that other uses would be unacceptable. Should a proposal for any other use be brought forward it would be necessary for the council to make a development management assessment on merit.

Dunfermline town centre: primary and secondary shopping designations

44. The designated core retail area extends westwards along High Street to the west side of the gap site on the northern side of the street. Beyond this is the “heritage quarter” which the council equates to the secondary shopping area. As is often the case, the boundary between the core and secondary areas is not clear cut and I agree that the quality of the shopping offer declines to the west of the junction between High Street and Guildhall Street. However, on balance I consider that the designation to the west of the junction should be retained as the core retail area. Similarly, I believe the boundary between the core area and the heritage quarter as shown on the General Dunfermline Framework Diagram is reasonable and does not require adjustment.

Dunfermline town centre: boundary extension to include Carnegie Drive Retail Park

45. The designated town centre is clearly focussed on High Street and the northern boundary, especially that part formed by the Kingsgate Centre, has little relationship with Carnegie Drive insofar as an active retail frontage is concerned. There is some access from the town centre to Carnegie Drive and there are some limited road crossing facilities for pedestrians. Pedestrian access from Carnegie Drive to the retail park is also restricted. Altogether, therefore, there are no clear and convenient pedestrian links
between the town centre and the retail park.

46. Whilst the Carnegie Drive Retail Park is close to the designated Dunfermline town centre, I agree with the council that Carnegie Drive, a major dual carriageway, provides a significant intervening feature in both visual and physical terms. The retail park is set at a lower level than Carnegie Drive and this further reduces the visual link with the town centre on the opposite side of the dual carriageway.

47. Currently, the retail park does not have a town centre ambiance being typical of its genre involving a line of retail units facing a car park. In my opinion, the council correctly describes the retail park as “edge-of-centre”. I note that the settlement plan describes the site as a development opportunity under reference DUN 075 and recognises scope for improvement to modern standards. However, there is also a recognition that improved links with the “Core Retail Area” will be required.

48. I note the council indicates the possible future need for a change to the town centre boundary and this could no doubt include consideration of the Carnegie Drive Retail Park, the Sheriff Court and police station as requested by Threadneedle Properties Ltd. However, in terms of the proposed plan, I conclude there is not a requirement or justification to alter the town centre boundary.

Dunfermline: ASDA Stores Limited, Halbeath Retail Park

49. The key to the map of Halbeath Retail Park in Figure 6.4(A) has been queried although the council’s response is limited to the contents of Figure 6.4(B). It seems clear that the initial legal agreement in respect of ASDA’s store at the Halbeath Retail Park expired in 1998 and that the subsequent extension was undertaken without any restriction on the use of floorspace within Class 1 of the Use Classes Order. On this basis, there is no restriction on the amount of floorspace used for either convenience or comparison goods within the store. In turn, there is no requirement for the map key to indicate “Class 1 55% Con, 45% Com” which, in any event, is not clear in its meaning. The simplest way to achieve clarity is to remove this element of the key and show the ASDA store in the beige colour denoting Class 1.

Glenrothes: core retail area (Kingdom Centre)(GLE 029)

50. Figure 6.5, Acceptable uses in town centre framework areas, indicates that use classes 1, 2, 3, 8 and 11 are acceptable within the core retail area of Glenrothes (identified as the Kingdom Centre). The Central Glenrothes Framework Diagram shows Policy GLE 029 extending, in schematic form, over the northern part of the core retail area and a small part of the adjacent secondary shopping area. In the settlement plan for Glenrothes, Policy GLE 029, North Street/Falkland Gate, is described as a “development opportunity for major retail and/or leisure development.” Use classes 1, 3, and 11 and sui generis uses are identified under “Status, additional development requirements, and other information”. As indicated, under Figure 6.5, classes 2 and 8 are also acceptable in the core retail area. Further uses are acceptable in the secondary shopping area.

51. In terms of uses, the relationship between the development opportunity at North Street/Falkland Gate (GLE 029) and Figure 6.5 is not clear. It would therefore be helpful if the Glenrothes settlement plan contained a cross reference to Figure 6.5 to indicate the range of acceptable uses within the core retail area and the secondary shopping
area in central Glenrothes. The reference to Classes 1, 3 and 11 and sui generis should therefore be omitted.

Figure 6.4(A) Central Fife Retail Park, and Figure 6.4 (B) Fife Central Retail Park, Kirkcaldy

52. The council has submitted a revised plan showing all the units in the northern section of the development designated as “Restricted Class 1 Non-Food”. Revised Figure 6.4(A) appears to reflect the terms of the planning permissions relating to the Central Fife Retail Park site and this revised plan should therefore replace the existing plan.

53. The council has also submitted revised text to advise on acceptable uses at the Central Fife Retail Park. I consider in general that the text is suitable for a commercial centre such as this and prefer this to the alternative approach suggested by Hammerson (Kirkcaldy) Ltd. The council has made a judgement on the level of Class 3 uses thought to be appropriate within the retail park and, on this basis, I believe it is reasonable for the proposed plan to indicate lack of support for any additional Class 3 uses. Of course, any future proposals of this nature would require to be assessed on merit in the context of the policy.

54. Although the revised text states that further expansion of the commercial centre will not be supported during the life-time of the proposed plan, I conclude below that site KDY 042, an extension to the retail park, should not be limited in terms of phasing. Future development would therefore depend on other considerations, notably the requirement for additional retail floorspace.

Kirkcaldy: Central Fife (Chapel Farm) Retail Park South - (KDY 042) modification

55. Although the council’s response seeks to draw attention to the precedence to be given to town centres, site KDY 042 is already allocated for an expansion to the existing retail park. The concern of Hammerson (Kirkcaldy) Ltd relates to phasing, a matter not initially addressed by the council. Subsequently, the council has indicated that the reference to 2020 in KDY 042 is in error. The date should be 2026 (as shown in Figure 6.4(A)), therefore precluding the development of the site during the lifetime of the proposed plan.

56. Whilst I accept the objectives of Policy 6, Town Centres First, I do not consider that the prevention of development on the expansion area of site KDY 042 prior to 2026 has been justified. Clearly, should development be proposed at an earlier date, it would be necessary to assess the proposal against the terms of Policy 6. In this respect, I believe the alternative wording suggested by Hammerson is appropriate and would allow the development of this land, in accordance with the designation contained in the proposed plan. The phasing would be related to an assessment against the viability and vitality of existing town centres and would require a sequential approach in terms of Policy 6. That assessment could also take account of the then current retail capacity information, which, as discussed above, has been the subject of recent studies commissioned by the council. The map of the Fife Central Retail Park also requires adjustment to reflect this change.

57. No representations have been submitted in respect of the consideration of other non-retail uses and therefore this sentence should remain other than for the alteration of
the date from 2020 to 2026.

**Dalgety Bay: town centre strategy**

58. It is commendable when local communities bring forward development strategies. In this case, the community council undoubtedly expended considerable effort in preparing the Town Centre Strategy for Dalgety Bay. As the council explains, the proposed plan reflects the land uses shown within the strategy. I agree with the council that the proposed plan, which covers the numerous communities throughout the extent of Fife, must embody consistency both in terms of presentation and pragmatism. In this latter respect, proposals in all areas must take account of wider council priorities. On this basis, I do not consider that the proposed plan should be modified in respect of Dalgety town centre.

**Secondary centres**

59. The proposed plan does not refer to “secondary centres” although Buckhaven, Methil and Methilhill are identified in Figure 6.1 as “local/neighbourhood” centres. The role played by “local centres” is defined in Figure 6.2. Figure 6.5 identifies acceptable uses in the town centre framework areas including Leven where uses in the “core retail area” and the “secondary shopping area” are identified.

60. The council’s response to the representation submitted by CLEAR indicates that acceptable uses for “the Leven area including secondary shopping areas” are identified in Figure 6.5. However, Figure 6.5 applies to the town centre framework areas, in this case as shown in the Central Leven Framework Diagram, including the secondary shopping area. As pointed out by CLEAR, no mention is made in the text of the proposed plan of other centres such as Buckhaven and Methil. The only reference is contained in Figure 6.1 although the local centres are also shown in the settlement map for Leven and the surrounding area.

61. I acknowledge the importance of local or neighbourhood centres within both the wider retail hierarchy and also in terms of supporting the urban fabric. In these respects, I note the spatial strategy contains a section dealing with “quality of place”. The principles involved require to be applied to all development proposals. When applied through the development principles set out in Policy 1, there is the potential for improving the quality of place in general and, in particular, in terms of this representation, to local or neighbourhood centres. In turn, the improved quality of place is likely to promote the continuing commercial use of the smaller centres. On this basis, I conclude that the proposed plan does not require to be changed in this respect.

**Reporter's recommendations:**

I recommend that the following modifications be made:

1. Delete references to “sequential test” and replace with “sequential approach” in Policy 6 (twice), in “Town Centres and policy frameworks” (once, in the final sentence of paragraph 2), in “The sequential test” (three times, including the section heading), Figure 6.1, Figure 6.3, and at any other relevant place elsewhere in the proposed plan and supporting documents.
2. On page 210, insert an additional sentence in paragraph 8 following “…Local Development Plan.” as follows:

“Any new public building or office with a gross floorspace of over 2,500 square metres proposed outwith a town centre contrary to the provisions of the local development plan will require an assessment of the impact on the town centre.”

3. Amend the first criterion of Policy 6 as follows:

“1. Comply with the sequential approach taking into account the catchment areas shown in Figure 6.1.”

and, amend paragraph 5 on page 210 as follows:

“For retail and commercial leisure uses, the sequential approach (described below) will take into account retail market area level rather than …”

4. Amend the third criterion of Policy 6 as follows:

“3. Will have no significant adverse effect on the vitality and viability of …”

5. Amend bullet 4 and add new bullet 5 to the sequence of locations contained in Policy 6 as follows:

“4. Other commercial centres identified in the local development plan (see paragraph 10 in “Applying Policy 6” below)

5. Out-of-centre locations that are, or can be, made easily accessible by a choice of transport modes.”

6. Delete the first sentence of that section of Policy 6 headed “Commercial centres” commencing “The expansion of commercial centres …”

7. In paragraph 10 on page 210, delete the first sentence commencing “The expansion of commercial centres …”; amend the second sentence (which becomes the first sentence) to begin “Should opportunities arise to redevelop…”; amend the final sentence by deleting “… equivalent capacity …” and replacing with “… equivalent area of retail floorspace …”

8. Amend paragraph 6 on page 210, by replacing the penultimate sentence as follows:

“Exceptions may be made where new development cannot be physically accommodated in a defined centre (town, local or commercial) or has specific locational requirements.”

9. Amend Figure 6.2, “Roles of town centres, local centres and commercial centres”, on page 212, by deleting the second (final) paragraph of the “Commercial Centres” section commencing “New development and changes of use …” and replace with:

“Figure 6.4(B) provides guidance on acceptable uses in commercial centres.”
10. Replace Figure 6.4(A), “Saltire Centre”, on page 213, with the revised drawing submitted by the council under cover of the letter dated 7 December 2015 in response to further information request 8.

11. In Figure 6.4(B), “Acceptable Uses in Commercial Centres”, on page 216, replace the guidance for the Saltire Retail Park, Glenrothes, as follows:

   “In addition to development previously granted planning permission, acceptable uses will be restricted to durable/non-food retail and non-food retail warehousing. New or further expansion of fashion related retail will be resisted. Other than the approved single hot food takeaway, Class 3 uses will not be supported.

   Should the opportunity arise, the council will explore the potential for comprehensive redevelopment of the centre if the retail uses can be successfully relocated to the town centre or edge-of-centre.”

12. In Figure 6.4(A) “Fife Leisure Park and Halbeath Retail Centre”, on page 215, delete from the key “Class 1 55% Con. 45% Com” (including the brown symbol). Alter the colour applied to the ASDA store (at the west end of the Halbeath Retail Centre) from the existing brown to the beige colour denoting “Class1” in the key.

13. In the settlement plan for Glenrothes, on page 92, under reference GLE 029, North Street/Falkland Gate, delete “Class 1 (shops), 3 (food and drink), 11 (assembly and leisure) and uses that are without specific use class (sui generis)” and replace with:

   “Figure 6.5 provides details of the use classes acceptable in the Glenrothes core retail area and secondary shopping area.”

14. In Figure 6.4(A) “Central Fife Retail Park”, on page 214, delete “Restricted Class 1 Bulky Goods” from the key (including the maroon symbol) and show the entire northern section of the development as “Restricted Class 1 Non-Food” in beige (this is as indicated in the council’s response to further information request 10, dated 14 December 2015.) – see also modification 16.

15. In Figure 6.4(B), “Acceptable Uses in Commercial Centres”, on page 216, replace the guidance for the Fife Central Retail Park, Glenrothes, as follows:

   “In addition to development previously granted planning permission, acceptable uses will be restricted to Class 1 non-food uses with limitations on the range and scale of goods sold. New or further expansion of convenience (food) and fashion related retail will not be supported. Further expansion of Class 3 uses will not be supported. The expansion of the commercial centre will be supported as set out in the Kirkcaldy settlement plan, site KDY042.”

16. In the settlement plan for Kirkcaldy, under reference KYD 042, “Central Fife Retail Park South”, on page 120, delete “after 2020 ... Town Centre.” and replace with:

   “which will be supported if it can be demonstrated that the proposal addresses either a quantitative or qualitative deficiency and otherwise accords with the provisions of Policy 6, Town Centres First”.

   and, in the final sentence, delete “2020” and replace with “2026”.
17. In the Fife Central Retail Park map, on page 214, delete “Long-Term Expansion Post 2026” in the key and replace with “Expansion Area”. – see also modifications 14 and 16.
**Issue 2f**  Countryside  

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| Reporter:  
| Dilwyn Thomas |  

**Body or person(s) submitting a representation raising the issue (including reference number):**  

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**Planning authority’s summary of the representation(s):**  

**Policy 7: Development in the Countryside**  

Reforesting Scotland (99): It is ‘A Thousand Huts’ campaign recommendation that rural huts are recognised as a form of access/facility for outdoor recreation. Users of rural huts would support the local economy and contribute to the local community. The renting of land for huts could be a form of farm diversification.

Scottish Natural Heritage (915): Agree with wording and strategic direction of the policy.

Jacobs (1185): The policy states that development in the countryside will only be supported where it meets one of seven criteria, none of which specifically mentions renewable energy development. Under the heading ‘Prime Agricultural Land’, three
criteria are listed, none of which appear relevant to renewable energy projects in the countryside. Scottish Planning Policy (paragraph 80) accepts that renewable energy should be listed as an exception to the presumption against development of prime agricultural land. Reference to renewable energy development is only made in the ‘Applying Policy’ text.

Network Rail (1865): Infrastructure adaptation, repair and protection will be required as a consequence of climate change. Works may be needed outwith the railway corridor to protect it and this type of activity is not explicit in the policy, other than reference to ‘proven’ countryside location. It is noted that development which supports essential infrastructure can be considered on prime agricultural land. Policy support to maintain and protect essential infrastructure is particularly required in countryside locations where countryside and transport links are vital and disruption harms communities. The wording is ambiguous where it states ‘be well located in respect of available infrastructure and contribute to the need for any improved infrastructure’

Wemyss Estate Trustees (2081): No reference is made to renewable energy or mineral proposals, both land uses that generally require a countryside location. It is inappropriate that the reference to these potentially significant land uses is in the supporting text with no reference in the policy itself. It is not clear if all of the identified policy criteria require to be met on a case by case basis or whether fulfilment of one criterion will suffice.

Gladman Developments Ltd (2756): Agree with spirit and purpose of policy. Policy should be caveated to ensure that it is not inappropriately used to prevent housing development on unallocated sites in order to address any shortfall in the effective housing land supply.

Scottish Government (3212): It is not clear why the reference to renewable energy included in bullet three of paragraph 80 of Scottish Planning Policy has been omitted from clause 3 of the Prime Agricultural Land section of the policy. Prime agricultural land is not identified as a constraint within Spatial Frameworks for wind farms in Scottish Planning Policy and is clear that renewable energy may be developed on prime agricultural land where such development is essential.

SEPA (3287): Support the importance and protection provided to Prime Agricultural Land, in keeping with authority’s duties under the Climate Change (Scotland) Act 2009 and in line with Scottish Planning Policy (paragraph 194). This policy aligns with the protection of carbon rich soils (including peat) in policy 13 ‘Natural Heritage & Access’.

Lynch Homes (3715): A fourth criterion should be added to the ‘Prime Agricultural Land’ section to ensure the Council’s development strategy accords with Scottish Planning Policy.

Avant Homes (3706): A fourth criterion should be added to the ‘Prime Agricultural Land’ section to ensure the Council’s development strategy accords with Scottish Planning Policy.

Policy 8: Houses in the Countryside

Hallam Land Management Ltd (3006), Homes for Scotland (1835), Lynch Homes (3716), Avant Homes (3707): Welcome criterion 7 as a flexible approach to considering new housing development in the countryside.
Gladman Developments (2757): Agree with spirit and purpose of policy but it should not be inappropriately used to prevent housing development on unallocated sites in order to address any shortfall in the effective housing land supply.

Reforesting Scotland (100): Huts are not for permanent occupation, are not houses and not relevant in this section. However, the conditions attached to eco-homes are similar to those applying to huts, so there may be a common purpose.

Derek Scott Planning (524): Object to criterion 3 in the policy and to paragraphs 15-16, ‘Derelict Sites’.

There are inconsistencies between the policy and paragraphs dealing with its application. Criterion 3 allows for the development of a new housing cluster that involves the imaginative and sensitive reuse of previously used land and buildings whereas paragraph 15 states that permission may be granted but only in exceptional circumstances to redevelop new housing clusters on smaller sites that are no longer required for their original purpose and which incorporate rundown or derelict buildings or where conversion to a residential use would bring about significant environmental and visual improvement.

The use of the term ‘housing cluster’ is of concern in criterion 3 and paragraph 15 as the definition of ‘cluster’ will be open to interpretation. The phrase ‘imaginative and sensitive re-use’ is of concern in relation to its interpretation and application in determining planning applications. The term ‘housing development’ as a substitute for ‘housing cluster’ would allow greater clarity and consistency in decision making.

Paragraph 15 refers to ‘exceptional circumstances’ where permission may be granted but criterion 3 does not make this reference. The redevelopment of derelict sites which have an adverse effect on the character and appearance of the countryside should be acceptable in all circumstances, not only in ‘exceptional circumstances’.

Scottish Natural Heritage (916): Note that there is a clear requirement that in all cases, proposals should not result in an overall reduction in landscape and environmental quality, with comments on other policies relevant to this particular requirement.

Network Rail (1866): It should be clear that where housing development may impact on the rail network the supporting Transport Assessment should include quantitative analysis of the likely effects, to inform developer contributions required.

There is ambiguous wording where it is unclear if the stated wording ‘well located in respect of available infrastructure and contribute to the need for any improved infrastructure’ should include ‘not’ before ‘contribute’.

Lynch Homes (3716), Avant Homes (3707): In relation to the 3rd bullet point in the policy, any development on a greenfield site would inevitably result in an overall reduction in the landscape and environmental quality and it is the significance of the impact which is critical in the determination. This bullet point should be amended to ensure the Council’s development strategy accords with Scottish Planning Policy in this respect.

David Paterson (2168): The Proposed Plan policy appears to favour the development of brownfield sites or redundant buildings but only if designed to create new ‘clusters’ (criterion 3).
Clarification is needed as guidance on the definition of a cluster is vague and scenarios which are unclear are questioned:

- Could development of a brownfield site adjacent to 2 or 3 houses create a ‘cluster’ and if the brownfield site could not accommodate the deficit of 5 would the site have no scope for development?
- If a brownfield site had no surrounding dwellings would a minimum of 5 houses need to be developed to create a ‘cluster’?
- Does the definition of a ‘cluster’ include the number of physical buildings or physical dwelling houses, e.g. including garages and out houses?
- If a converted steading has the appearance of three dwellings but serves as one, does it count as three or one in terms of buildings?
- The reference to ‘buildings will be located in very close proximity to one another’ is vague.

R Gilchrist (3066): The ‘Applying Policy’ section makes no reference to criterion 6. Several points need to be clarified:

- The definition of ‘small scale’ could vary in the context of different settlements.
- It is unclear what is meant by ‘edge’ of settlement. An illustration could demonstrate how development should be integrated with the settlement in terms of an acceptable location. This would avoid enabling sites which are poor in terms of their contribution to settlement form, setting and visual impact.
- The ‘shortfall in local provision’ needs to be defined. The policy indicates that this should be consistent with policy 2 (Homes) but that policy makes no reference to shortfall in terms of affordable housing in the countryside.
- There are several other inconsistencies in the wording between this policy and Policy 2 (Homes) and the related Applying Policy text (detailed in the submission).

Policy 9: Green Belt

Scottish Natural Heritage (917): Note that the policy is consistent with Scottish Planning Policy.

Wemyss Estate Trustees (1187): The policy does not specifically refer to renewable energy development. It refers to the need to be compliant with Policy 7 which only mentions renewable energy in the Applying Policy section and not in policy text. Policy 8 makes no reference to renewable energy. Scottish Planning Policy (paragraph 52) states that Local Development Plan should describe the types and scales of development which would be appropriate within a green belt. The policy should include renewable energy as an appropriate ‘type’ of development in a green belt.

Not all development in a green belt may be able to comply with the 5 criteria in the policy and therefore the requirement should change from full compliance (must) to a demonstration of the principles set out in the criteria.

Criterion 2. does not allow for any additions to the setting of St. Andrews and Dunfermline due to the inclusion of the word ‘maintain’ and should be changed.

The Royal Burgh of St Andrews Community Council (1509): Object to the policy wording. It must be clearly stated to conform to Scottish Planning Policy (as in St. Andrews & East
Fife Local Plan 2012). The proposed wording will make it easier for developers to build in the Greenbelt.

Old Course Hotel (1363): Have no issue with the Adopted St. Andrews & East Fife Local Plan Policy E17: Green Belt definition of the purpose of the green belt. However, consider that the weight that Fife Council attach to assessment of proposals in St Andrews has traditionally been to ensure first the ‘critical views to and from the historic core’ are considered and mitigated. Wish to see the current adopted green belt policy intentions retained as they currently are worded. Consequently, support in principle the wording of this proposed Plan policy but concerned with additional safeguard which states ‘in addition, development in the green belts will only be supported if it is for developments meeting a national requirement or established need, if no other suitable site is available, or provides essential infrastructure and no other suitable site exists out with the green belt’. Acceptable non-conforming uses, or types of use, could be listed as a sub text to this phrase, in line with the uses listed in Policy 7: Development in the Countryside. This would retain control over the acceptable types of use and activity allowed in the countryside, but with the requirement that these new developments would need to respect the key functions of the green belt. It should be possible to achieve appropriate high quality development in the excepted locations.

Network Rail (1867): Support recognition given to presence of essential infrastructure within green belt land.

Gladman Developments (2758): Agree with spirit and purpose of policy but should not be inappropriately used to prevent housing development proposed on unallocated sites to address any shortfall in the effective housing land supply.

P M Uprichard (2813): This policy is much weaker than Adopted St. Andrews & East Fife Local Plan policy E17. Green space will continue to be regarded by Fife Council as a development opportunity. The value to tourism of landscape and views is lost by the authors of these Plans. A comparison of Adopted Local Plan policy E17 and this proposed Plan policy is made including the comments:

- Policy E17 states that development is required to confirm to Scottish Planning Policy whereas this policy states that development in the green belt is required to conform to other Fife Council policies, not Scottish Planning Policy.
- Question wording of numbered criterion 1. In the policy in terms of what is meant by ‘be of a scale and nature’ and what are the ‘surrounding uses’.
- The requirement in Adopted Local Plan policy E17 for ‘overall enhancement’ has been downgraded in this proposed Plan policy to ‘not detract from, or result in depreciation’.
- The requirement in Adopted Local Plan policy E17 for ‘new development of exemplary design’ has been downgraded in this proposed Plan policy to ‘high quality design’.

Lynch Homes (3717), Avant Homes (3708): Development on a greenfield site would inevitably reduce landscape and environmental quality. The significance of the impact is critical in the determination. Amend the policy to ensure that the Council’s development strategy accords with Scottish Planning Policy.
## Modifications sought by those submitting representations:

**Policy 7: Development in the Countryside**

‘Huts’ and access to the countryside and recreation

‘Huts’ should be specifically defined in the glossary as a facility for outdoor recreation and access to the countryside. (99)

**Renewable Energy and Minerals**

Renewable energy development should be included in the policy with the first criteria test, 1. to .7, to include: ‘Where the proposal is for renewable energy development compliant with Policy 11: Low Carbon Fife’. (1185)

There should be clarification of the policy in relation to renewable energy development on prime agricultural land (clause 3 of the section on Prime Agricultural Land should accord with bullet three of paragraph 80 of Scottish Planning Policy). (3212)

Specific reference should be made to renewable energy and mineral proposals or appropriate cross reference made to other policies which provide the primary basis for assessing these proposals. (2081)

**Essential infrastructure**

Policies which anticipate and support the need to protect the public’s significant investment in existing infrastructure in terms of climate change should be provided in the Proposed Plan. An additional criterion should read ‘Is for the protection and repair of existing essential/strategic infrastructure’. (1865)

**Prime Agricultural Land**

Under the heading 'Prime Agricultural Land' the word 'essential' should be removed from ‘Development on prime agricultural land will not be supported except where it is essential’ as it could potentially prejudice developments which are compliant with the thrust of national planning policy, such as renewable energy proposals. (1185)

A further exception should be added to the Prime Agricultural Land section – ‘renewable energy development where land take has been minimised and is in accordance with Policy 11: Low Carbon Fife’. (1185)

There should be clarification of the policy in relation to renewable energy development on prime agricultural land (clause 3 of the section on Prime Agricultural Land should accord with bullet three of paragraph 80 of Scottish Planning Policy). (3212)

Add criterion to ‘Prime Agricultural Land’ section to read ‘To assist the Council maintain a 5 year effective housing land supply at all times, residential development will be granted if the sustainability of the proposal accords with the guiding principles of sustainable development set out in Scottish Planning Policy paragraph 29.’ (3706) (3715)
Clarity of Policy Wording

The ambiguous wording ‘be well located in respect of available infrastructure and contribute to the need for any improved infrastructure’ should be changed to ‘not contribute to the need for any improved infrastructure’. (1865)

Clarification should be given on the requirements to meet all, or some, of the listed criteria. If not all criteria are to be addressed in every case the word ‘or’ should be inserted at the end of each criterion to clarify matters. (2081)

Addressing a shortfall in the Housing Land Supply

The policy should be appropriately caveated to ensure it is not inappropriately used to prevent housing development on unallocated sites in order to address any shortfall in the effective housing land supply. (2756)

Policy 8: Houses in the Countryside

Gladman Developments (2757): The policy should be appropriately caveated to ensure it is not inappropriately used to prevent housing development on unallocated sites in order to address any shortfall in the effective housing land supply.

Derek Scott Planning (524): Criterion 3 should be reworded to ‘It is for a new housing development that involves the redevelopment of a site incorporating rundown or derelict buildings which results in an improvement to the landscape and environmental quality of the area’

Paragraph 15 should be reworded to ‘Planning Permission may be granted for new housing development on sites that are no longer required for their original purpose and which incorporate rundown or derelict buildings. Planning permission will only be granted where the redevelopment scheme would result in an improvement to the landscape and environmental quality of the area, subject to the design, siting, and the environmental improvements proposed.’

Network Rail (1866, 1865): It should be clear that Transport Assessments related to housing development should consider impacts on the rail network, to ensure appropriate development contributions are sought.

The ambiguous wording ‘be well located in respect of available infrastructure and contribute to the need for any improved infrastructure’ should be changed to ‘not contribute to the need for any improved infrastructure’.

David Paterson (2168): Clarification of the definition of ‘cluster’ required.

R Gilchrist (3066): Include reference to application of criterion 6. in the Applying Policy text and clarify meaning of ‘small scale’, ‘edge of settlement’, ‘shortfall in local provision’ and other inconsistent wording between Policy 2: Homes and this Policy.

Lynch Homes (3716): Amend bullet point 3 to ‘will not result in a significant adverse effect on the landscape and environmental quality of the area’.

Avant Homes (3707): Amend bullet point 3 to ‘will not result in a significant adverse effect on the landscape and environmental quality of the area’. 
effect on the landscape and environmental quality of the area’.

**Policy 9: Green Belt**

Wemyss Estate Trustees (1187): The policy wording should change to ‘development in green belts will only be supported if it is for development meeting a national requirement (including renewable energy development) or established need.’ The wording ‘In all cases development in the green belts must’ should be changed to ‘In all cases development in the green belts should seek to demonstrate the following principles, which the planning authority will also use in deciding whether or not to grant planning permission. ‘Bullet point 2. should be changed to ‘Development shall demonstrate an appreciation of the setting and key views to and from the historic core of Dunfermline or St Andrews, as appropriate’.

The Royal Burgh of St Andrews Community Council (1509): Include reference in policy to conformity with Scottish Planning Policy.

Old Course Hotel (1363): List acceptable non-conforming uses or types of use, as a sub text to second paragraph of proposed Policy 9: Green Belt, beginning ‘In addition’, in line with the uses listed in Policy 7: Development in the Countryside, including use ‘required for agricultural, horticultural, woodland, or forestry operations; diversify or add to the above land-based businesses to bring economic support to the existing business; Is for extension of established businesses’.

Gladman Developments (2758): Policy should be caveated to ensure it does not prevent housing development on unallocated sites in order to address a shortfall in the effective housing land supply.

P M Uprichard (2813): Clarify and strengthen policy wording and refer to need for compliance with Scottish Planning Policy.

Lynch Homes (3717), Avant Homes (3708): Delete criterion 3 and replace with wording ‘Will not result in a significant adverse effect on the landscape and environmental quality of the green belt’.

**Summary of responses (including reasons) by planning authority:**

**Policy 7: Development in the Countryside**

**General**

The policies in FIFEplan have been structured to minimise cross referencing and to highlight all the issues that a proposal must address to be acceptable. The guide to the ‘FIFEplan policies’ section outlines that Policy 1: Development Principles is a ‘gateway’ policy and provides the development principles against which development proposals will be determined, supported by a further 14 policies which relate to a least one of the development principles. Also, to provide clarity to the developer and those determining the suitability of a proposal, the policies focus on what development must address rather than providing policy justification or guidance on how it should be implemented. Adding new sections to the supporting policies, which are not covered in Policy 1, cross referencing or adding general text on how policy will be implemented to the policies will
impair the ability of the plan to function properly.

‘Huts’ and access to the countryside and recreation

The Council acknowledges that Scottish Planning Policy (paragraph 79) states that development plans should set out a spatial strategy which, ‘where appropriate, sets out policies and proposals for leisure accommodation, such as holiday units, caravans, and huts’. Proposed Policy 7: Development in the Countryside provides a framework for supporting the development of ‘huts’ in the countryside through several of the policy criteria, along with other forms of leisure accommodation. It is not considered necessary to include the term ‘hut’ in the Proposed Local Development Plan Glossary as it is not a term used in the Proposed Plan. Scottish Planning Policy (2014) glossary includes a detailed definition of a ‘hut’ and this is considered sufficient to meet the needs of Fife Council. (99)

Renewable Energy and Minerals Development

The policies in FIFEplan have been structured to minimise cross referencing. The ‘A guide to the FIFEplan policies’ section outlines that Policy 1: Development Principles is a ‘gateway’ policy and provides the development principles against which development proposals will be determined, supported by a further 14 policies which relate to a least one of the development principles. Policy 1 provides a guide to the specific policies relevant to assessing minerals and renewable energy proposals. (2081)

Criterion 6. of the policy wording supports development in the countryside where it ‘is for facilities for outdoor recreation, tourism, or other development which demonstrates a proven need for a countryside location’. The section on Applying Policy 7’ includes, in point 4, reference to the circumstances where countryside locations are the most appropriate – or only feasible – places to locate energy or minerals developments. In these cases, this policy will be applied in assessing and managing the impact of a proposal that can be otherwise be supported by the Development Plan.

It is considered that criterion 6, and potentially other criteria in this policy, along with the explanation in the Applying Policy text, are sufficient to address proposals for renewable energy and minerals development in the countryside in line with Scottish Planning Policy. It is not appropriate to attempt to include all potential land uses within the policy criteria. (1185) (2081)

Clarification of renewable energy development in relation to prime agricultural land is addressed in the section below. (3212)

Essential Infrastructure

Criterion 6. of the policy wording supports development in the countryside where it ‘is for facilities for outdoor recreation, tourism, or other development which demonstrates a proven need for a countryside location’. The Prime Agricultural Land section allows provides support, in criterion 1, ‘for development where it is essential ‘as a component of the settlement strategy or necessary to meet an established need, for example for essential infrastructure, where no other suitable site is available;’ It is considered that this reference is sufficient to support development proposals which relate to the protection and repair of existing essential/strategic infrastructure in the countryside and which can be otherwise supported by the Proposed Plan. (1865)
Prime Agricultural Land

The inclusion of ‘essential’ is compliant with Scottish Planning Policy (paragraph 80) and no change is needed. (1185)

It is acknowledged that Criterion 3. of the Prime Agricultural Land section of the policy is inconsistent with Scottish Planning Policy in omitting to allow support for the generation of energy from a renewable source. This is addressed below.

An additional criterion relating to residential development on prime agricultural land is not required, consistent with Scottish Planning Policy (paragraph 80). Criterion 1. of the Prime Agricultural Land section supports development where it is essential as a component of the settlement strategy. Policy 1: Development Principles and Policy 2: Homes will guide the Council in maintaining a 5 year effective housing land supply in accordance with the principles of sustainable development in Scottish Planning Policy (paragraph 29). (3706) (3715)

Taking all of this into account, Fife Council considers that there is merit in the amended wording of the policy, below, and invites the Reporter to make an appropriate recommendation on this issue.

Amended Wording

Delete criterion 3. in Prime Agricultural Land section and replace with the new text:

‘3. For the generation of energy from a renewable source or the extraction of minerals where this accords with other policy objectives and a commitment to restore the land to its former status within an acceptable timescale.’

(1185) (3212)

Clarity of Policy Wording

Reference to ‘Infrastructure’

The wording ‘be well located in respect of available infrastructure and contribute to the need for any improved infrastructure’ is correct and is not considered to be ambiguous. The representation from Network Rail relating to this comment seeks policy support to maintain and protect transport infrastructure. This policy, along with other ‘countryside’ policies, includes a mechanism to support these aims.

Further policies are relevant in addressing transport infrastructure. Proposed Plan Policy 1 (Part B,) requires that all development proposals must address their impacts, with point 11. requiring that they must ‘not compromise the performance or safety of strategic infrastructure or, alternatively, assist in the delivery of necessary improvement to mitigate impact arising from development.’ Proposed Plan Policy 3: Infrastructure and Services and Proposed Supplementary Guidance on Planning Obligations (CD46) provides the policy and detail to guide when and how infrastructure requirements will be sought for both strategic developments and site specific requirements. (1865)

Bulleted List

The bulleted lists included in the proposed Plan policies are punctuated as a continual
sentence and their interpretation relies on the word which separates the final two bullets. If ‘and’ then each of the bullets applies and if ‘or’ then one or more of the bullets may apply.

This is a generally accepted way of punctuating a list that reads as a continual sentence. However, it is recognised that there is an error in the list construction. The first word in each bullet (from the second bullet onwards) should be lower case. (2081)

Taking all of this into account, Fife Council considers that there is merit in:

• ensuring the initial letter is lower case in any bulleted list written as a single sentence

and invites the Reporter to make an appropriate recommendation on this issue.

Addressing a shortfall in the Housing Land Supply

The Local Development Plan Policy 1: Development Principles is a ‘gateway’ policy. It provides the principles against which development proposals will be determined. It is supported by accompanying subject based policies which will be applied in determining whether development is acceptable.

Policy 2: Homes addresses the maintenance of a continuous 5-year effective housing land supply. If there is a shortfall, the methodology (Figure 2.1) included in Policy 2 explains the sequential test used to determine if a proposal may be supported in principle or is not supported. Part of the process includes considering whether the proposal conforms with the Local Development Plan strategy and policies.

It would not be appropriate to include a reference to housing shortfall in this Policy 7: Development in the Countryside. Establishing the principle of allowing housing on non allocated sites is adequately addressed in Policy 2: Homes. The acceptance of a shortfall in housing land does not mean that proposed sites are exempt from meeting the policies of the rest of the Local Development Plan. For countryside locations, even where a shortfall in housing land is identified through Policy 2, the site must be justified against other relevant parts of FIFEplan Policy 1 and supporting policies, including Policy 7.

Policy 8: Houses in the Countryside

General Comments

The policies in FIFEplan have been structured to minimise cross referencing and to highlight all the issues that a proposal must address to be acceptable. The guide to the FIFEplan policies’ section outlines that Policy 1: Development Principles is a ‘gateway’ policy and provides the development principles against which development proposals will be determined, supported by a further 14 policies which relate to a least one of the development principles. Also, to provide clarity to the developer and those determining the suitability of a proposal, the policies focus on what development must address rather that providing policy justification or guidance on how it should be implemented. Adding new sections to the supporting policies, which are not covered in Policy 1, cross referencing or adding general text on how policy will be implemented to the policies will impair the ability of the plan to function properly.
Shortfall in the 5-year effective housing land supply

Support for flexibility in approach is noted in relation to criterion 7. The policy will be used to give appropriate support to the development of houses in the countryside to address a shortfall in the 5 year effective housing land supply, along with other proposed Plan Policies.

The Local Development Plan Policy 1: Development Principles is a ‘gateway’ policy and provides the development principles against which development proposal will be determined. It is supported by accompanying policies to provide a policy framework supporting the primacy of the Development Plan as the main route through which development sites should be identified. Opportunities for development which may address a shortfall in the effective housing land supply during the lifetime of the Plan will be supported if they conform to the Development Plan and the relevant policies can determine if such a proposal in the countryside is acceptable, including through the use of this policy (bullet 7.) proposed Plan Policy 2: Housing and Policy 7: Development in the Countryside. It would not be appropriate to include a reference to a housing shortfall in this policy. The shortfall calculation is an assessment on whether there is a need to consider additional sites in a given location. The acceptance of a shortfall in housing land does not mean that sites are exempt from meeting the policies of the rest of the LDP.

Definition of ‘cluster’

The explanation of cluster is considered sufficiently clear to enable proper consideration of proposals in the development management process. It is not possible to include examples of every eventuality but the policy and supporting text in ‘Applying the Policy’ is sufficient to assess small scale housing proposals in the countryside. Each case would be considered on its own merits.

It is clear in criterion 2. that a cluster is defined by the actual number of houses (not other buildings, such as sheds, or the visual appearance of a greater number of houses than are actually present). Criterion 3 supports the creation of a new housing cluster on previously used land and buildings (i.e. able to accommodate 5 or more, up to a maximum of 24 houses). Brownfield sites unable to accommodate at least 5 dwellings would not be supported by this criterion as the intention is to restrict isolated housing development in the countryside. Further clarification of developing a cluster in relation to brownfield land may be helpful in the supporting text (paragraph 15-16, Derelict Sites, page 223). The term ‘very close proximity’ (page 222, paragraph 7.) is considered to be well enough understood in the context of assessing the form of rural settlements.

Clarity of Policy Wording

Reference to ‘Infrastructure’

The wording ‘be well located in respect of available infrastructure and contribute to the need for any improved infrastructure’ is correct and is not considered to be ambiguous. The representation from Network Rail relating to this comment seeks policy support to maintain and protect transport infrastructure. This policy, along with other ‘countryside’ policies, includes a mechanism to support these aims.

Further policies are relevant in addressing transport infrastructure. Proposed Plan Policy
1 (Part B,) requires that all development proposals must address their impacts, with point 11. requiring that they must ‘not compromise the performance or safety of strategic infrastructure or, alternatively, assist in the delivery of necessary improvement to mitigate impact arising from development.’ Proposed Plan Policy 3: Infrastructure and Services and Proposed Supplementary Guidance on Planning Obligations (CD46) provides the policy and detail to guide when and how infrastructure requirements will be sought for both strategic developments and site specific requirements.

**Requirement that development ‘must’ comply with criteria**

It is considered appropriate to use ‘must’ in requiring development proposals in the countryside to comply with the three bulleted criteria, concluding the policy, and that the criteria should be unchanged. Using wording such as ‘significant adverse effect’ will undermine the robust use of the policy required to ensure the quality of Fife’s placemaking in the countryside.

All development proposals should reinforce Fife’s valued landscape and settlement character. The draft Proposed Supplementary Guidance ‘Making Fife’s Places’ (CD51) includes (page 4, Environmental Benefits), that: ‘Sensitive proposals protect and enhance built heritage and natural environments’ and ‘Sensitive siting and design fits new buildings into the landscape setting/townscape context’. A proposal which did not meet these requirements would not be considered acceptable.

‘Significant adverse effect’ is not a phrase used elsewhere in the proposed Plan. The significance of any effect is fundamental to the decision making process in terms of the overall assessment of any proposal and it is unnecessary to state this in each case throughout the policies.

**Transport Assessments**

Transport Assessments will be required where any proposed development will have transport implications, and consequently, a significant effect on the transport network, including rail, in the area of the proposal. Applicants will be advised on the need for, and detail, of any Transport Assessment. Network Rail is a statutory consultee in the planning process and will be consulted on proposals near railway lines. It is not necessary to make specific reference in this policy for consideration of the impacts of housing development on the rail network.

**Policy 9: Green Belt**

**Reference to Scottish Planning Policy/ clarify policy wording**

The Town and Country Planning (Scotland) 1997 Act requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise. Scottish Planning Policy 2014 (page 2, iii) (CD1) includes that ‘As a statement of Ministers’ priorities the content of the SPP is a material consideration carrying significant weight though it is for the decision-maker to determine the appropriate weight in each case. Where development plans and proposals accord with this SPP, their progress through the planning system should be smoother’. It is unnecessary (and inconsistent with the overall approach taken in the Local Development Plan policies) to make a specific cross reference to Scottish Planning Policy. It is intended that the policy text demonstrates consistency with Scottish Planning Policy.
However, it is acknowledged that the clarity and structure of this policy could be improved to avoid any difficulties in its interpretation and implementation. Scottish Planning Policy 2014 (paragraph 52) states that Local Development Plans should describe the types and scales of development which would be appropriate within a green belt. It would be preferable for Fife Council to make specific reference to the acceptable development types within this policy rather than including the current first paragraph of the policy which cross references to Policies 7 and 8. The general approach of the overall FIFEplan is to avoid cross referencing between policies.

Acceptable ‘non-conforming uses’ are identified in the policy, solely in the St. Andrews green belt and at Craigtoun Park, the Old Course Hotel and St. Andrews Links complex.

Scottish Planning Policy (2014) (paragraph 55) states that ‘Local development plans should contribute to high-quality places by setting out how they will embed a design-led approach.’ This Council has prepared proposed Supplementary Guidance, ‘Making Fife’s Places’ (CD51) providing guidance on issues relating to the design of development and it is considered that the policy framework (including the use of the gateway Policy 1: Development Principles and supporting Policy 14 – Built and Historic Environment in the consideration of every relevant proposal) along with Supplementary Guidance will ensure that Fife Council’s expectations for good design are achieved.

It is considered appropriate to use ‘must’ in requiring development proposals in the Green Belt to comply with the numbered criteria 1-5. and that the criteria should be unchanged (with the exception of minor amendment to criterion 3, see below). Using wording such as ‘seek to demonstrate’ or ‘significant adverse effect’ will undermine the robust use of the policy required to ensure the protection and enhancement of the character, landscape setting and identity of Dunfermline and St. Andrews.

All development proposals should reinforce Fife’s valued landscape and settlement character. The draft Proposed Supplementary Guidance ‘Making Fife’s Places’ (CD51) includes (page 4, Environmental Benefits), that: ‘Sensitive proposals protect and enhance built heritage and natural environments’ and ‘Sensitive siting and design fits new buildings into the landscape setting/townscape context’. A proposal which did not meet these requirements would not be considered acceptable.

‘Significant adverse effect’ is not a phrase used elsewhere in the proposed Plan. The significance of any effect is fundamental to the decision making process in terms of the overall assessment of any proposal and it is unnecessary to state this in each case throughout the policies.

Criterion 3. of this policy 9 states that development in the green belt must ‘Not detract from, or result in depreciation to, the landscape and environmental quality of the green belt’.

This wording is inconsistent with the related bullets in Policy 7: Development in the Countryside and Policy 8: Houses in the Countryside which state that development must ‘Not result in an overall reduction in the landscape and environmental quality of the area’.

The words ‘detract’, ‘depreciate’ and ‘reduce’ could all be interpreted as meaning the same although the intention is that the wording in this policy 9 should have a greater requirement in terms of the landscape and environmental quality of the area. This is
consistent with the requirement in this policy 9 to ‘improve local infrastructure’, whereas policies 7 and 8 include the requirement to ‘contribute to the need for any improved infrastructure’ (CD46, pages 219 and 221).

Amended Wording

Taking all of this into account and to comply more closely with the wording of SPP, Fife Council considers that there is merit in the amended wording of the policy, below, and invites the Reporter to make an appropriate recommendation on this issue.

Delete the first two paragraphs of the policy, and first line of third paragraph in policy, and replace with the text:

‘Development in designated green belt will only be supported where it:

1. is required for agricultural, horticultural, woodland, or forestry operations;
2. is for retailing directly connected with agriculture and horticulture e.g. farm shops;
3. is for outdoor recreation uses compatible with an agricultural or natural setting;
4. is for intensification of established uses;
5. is for housing where it:
   a) is for the rehabilitation and or/conversion of complete or substantially complete existing buildings;
   b) is for the demolition and subsequent replacement of an existing house (provided it complies with Policy 8 criterion 4).
6. is for essential infrastructure, such as digital communications and electricity grid connection, and no other suitable site is available; or
7. is for development meeting a national requirement or established need, if no other suitable site is available.

The policy criteria above in 1.-7. will apply, except at the following locations in the St. Andrews green belt: ‘

Delete criterion 3. in the policy and replace with the text, ‘3. Improve the landscape and environmental quality of the Green Belt’.

Delete paragraph 1. in Applying Policy 9: Green Belt text and replace with the text, ‘The Applying Policy text for Policy 8: Houses in the Countryside should be used, in part, in association with this policy:

para.
2.-5. Development that supports existing business
10. Extensions to an existing property
11.-14. Demolition/replacement of a house
17-19. Renovation of existing buildings’

Addressing a shortfall in the Housing Land Supply

The Local Development Plan Policy 1: Development Principles is a ‘gateway’ policy. It provides the principles against which development proposals will be determined. It is supported by accompanying subject based policies which will be applied in determining whether development is acceptable.
Policy 2: Homes addresses the maintenance of a continuous 5-year effective housing land supply. If there is a shortfall, the methodology (Figure 2.1) included in Policy 2 explains the sequential test used to determine if a proposal may be supported in principle or is not supported. Part of the process includes considering whether the proposal conforms with the Local Development Plan strategy and policies.

It would not be appropriate to include a reference to housing shortfall in this Policy 9: Green Belt. Establishing the principle of allowing housing on non-allocated sites is adequately addressed in Policy 2: Homes. The acceptance of a shortfall in housing land does not mean that sites are exempt from meeting the policies of the rest of the Local Development Plan.

Renewable Energy

The policies in FIFEplan have been structured to minimise cross referencing. It is considered that the wording of this policy 9: Green Belt is sufficient to support any renewable energy proposal which is a national requirement, if no other suitable site is available, in line with Scottish Planning Policy. It is unnecessary to list potential development types which may be national requirements within the policy.

The ‘A guide to the FIFEplan policies’ section outlines that Policy 1: Development Principles is a ‘gateway’ policy and provides the development principles against which development proposals will be determined, supported by a further 14 policies which relate to a least one of the development principles. Policy 1 provides a guide to the specific policies relevant to assessing renewable energy proposals, including Policy 11: Low Carbon Fife.

Reporter’s conclusions:

Policy 7: Development in the Countryside

1. Policy 7 of the proposed plan contains 7 criteria for assessing proposals for development in the countryside. It includes a further 3 requirements, which all proposed development should satisfy. Additional policy criteria are set out for controlling development on prime agricultural land.

2. Scottish Planning Policy indicates that the planning system should promote a pattern of rural development that is appropriate to the character of the particular area, and the challenges it faces. It also encourages development that supports prosperous and sustainable communities and businesses whilst protecting and enhancing environmental quality.

3. Scottish Planning Policy explains that a plan’s spatial strategy should, where appropriate, set out policies and proposals for leisure accommodation, such as holiday units, caravans, and huts. Criteria 5 and 6 of Policy 7 indicate that development in the countryside will be supported where: it is for “facilities for access to the countryside” (criterion 5) and for “facilities for outdoor recreation, tourism, or other development which demonstrates a proven need for a countryside location” (criterion 6). The 2 criteria cover a range of different types of development that would be appropriate in the countryside and could benefit the local economy. I am satisfied that the criteria, which are set out in general terms, are intended to include huts, that they adequately reflect the terms of
national guidance, and that they are reasonably clear on what may be acceptable development. Additionally, nothing has been drawn to my attention which would suggest that there are particular circumstances in the plan area to justify adding an explicit reference to huts in Policy 7, or elsewhere. In the circumstances, I do not consider that there is a need to include, or that there would be a significant benefit from including, a definition of huts in the glossary of the proposed plan.

4. By their very nature, renewable energy and mineral developments can be appropriate in countryside locations. This is clear from the approach set out in Scottish Planning Policy for dealing with such proposals. They are covered, respectively, by Policies 11: Low Carbon Fife and 15: Minerals of the proposed plan. The council explains that the policies in the proposed plan have been structured to minimise cross referencing, with Policy 1 being a gateway policy which provides development principles. Criterion 6 of Policy 7 indicates, amongst other things, that “other development which demonstrates a proven need for a countryside location” would be supported. Taking this statement together with the references in the supporting text of Policy 7 to countryside locations being the most appropriate, or only feasible, places to locate such developments, and the terms of Policies 11 and 13 (as recommended for adjustment in this report), I consider that these developments are adequately covered by the proposed plan when taken as a whole, and that no explicit reference to them in the wording of Policy 7 is required.

5. Scottish Planning Policy sets out 3 situations where development on prime agricultural land can be supported. The 3 situations are referred to in the section of Policy 7 dealing with prime agricultural land, but no reference is made to the fact that Scottish Planning Policy allows development on such land where it is essential for the generation of energy from a renewable source. The council proposes an adjustment which would add a reference to renewable energy in this section of the policy. As this adjustment would make this section of the policy consistent with Scottish Planning Policy, it is clearly appropriate. The word “essential” should not be removed from the second line of this section of the policy because this is the wording used in Scottish Planning Policy.

6. I am also satisfied that the reference in criterion 6 to “other development” being potentially supported, adequately covers the need to protect and repair existing essential/strategic infrastructure located in the countryside. There is therefore no need to add a separate criterion to the policy relating to such infrastructure. I do not consider that the wording in the second bullet point of the policy is either lacking clarity or ambiguous. It clearly requires all development to be both well located for available infrastructure and contribute to the need for any improvements. Additionally, I agree with the council that references to infrastructure in Policy 7 require to be considered alongside similar references in other policies in the proposed plan, such as Policy 1: Development Principles (part B, criterion 11) and Policy 3: Infrastructure and Services, as they provide a context for Policy 7.

7. Policy 2: Homes of the proposed plan deals in detail with the housing land supply and the process to be followed if a shortfall is shown to exist. Criterion 7 of Policy 7 indicates that development in the countryside will be supported where it is for housing in line with Policy 8: Houses in the Countryside. Criterion 7 of Policy 8 addresses the prospect of a shortfall in the housing land supply and links to Policy 2. Subject to the recommendations in this report for adjusting Policy 2, and the consequential changes required to criterion 7 (Policy 8), I consider that the approach in Policy 8, in association
with Policy 7, to assessing proposals for housing development in the countryside would be reasonable, and I am satisfied that there would be nothing in the terms of either criterion which would suggest that they would be likely to be used inappropriately to prevent housing on non-allocated sites where a shortfall in the land supply exists.

8. In dealing with prime agricultural land, Scottish Planning Policy refers to permitting development where it is essential as a component of the settlement strategy. However, it does not refer in its criteria to allowing development where it assists the council to maintain a 5 year effective housing land supply and accords with the guiding principles of sustainable development. In the absence of such a reference in national policy, I consider it inappropriate to add a further criterion along these lines to the section of Policy 7 dealing with prime agricultural land.

9. I note that there is a typographical error in the construction of the lists in Policy 7, and that this is repeated elsewhere in the policies part of the plan. The council indicates that the lists are meant to be read as a continuous sentence. While the points or bullets in the lists are separated by a semi-colon, they all begin with a capital. The council accepts, and I agree, that this could cause some confusion in using the policy, in particular in deciding whether all or at least one of the points or bullets apply. The council suggests that the initial letter in the lists is written in lower case. This seems to me to be a reasonable approach to reducing the potential for confusion. As a consequence of making this change to Policy 7, and to ensure consistency, it would be appropriate to make the same change, where appropriate, to other policies in the proposed plan. I am not persuaded that it would be more helpful to insert the word ‘or’ after every point or bullet where not all of the criteria in the list apply.

10. Overall, adjustments are required to the proposed plan, as set out below.

Policy 8: Houses in the Countryside

11. Policy 8 of the proposed plan contains 9 criteria for assessing proposals for houses in the countryside. It includes a further 3 requirements, which all proposed development should satisfy.

12. Scottish Planning Policy considers that in accessible or pressured rural areas, a more restrictive approach to new housing development is appropriate, and that plans should guide most new development to locations within or adjacent to settlements, and set out the circumstances in which new housing outwith settlements may be appropriate. It also explains that in remote rural areas plans should, amongst other things: support and sustain fragile and dispersed communities through provision for appropriate development, especially housing; include provision for small scale housing in a range of locations, taking account of environmental protection policies and addressing issues of location, access, siting, design and environmental impact; and where appropriate, allow the construction of single houses outwith settlements provided they are well sited and designed to fit with local landscape character, taking account of landscape protection and other plan policies.

13. Criterion 7 of Policy 8 addresses the prospect of a shortfall in the housing land supply. Taking this together with my conclusions in relation to Policy 7 above, and subject to the recommendations in this report for adjusting Policy 2, and the consequential changes required to criterion 7, I consider that the approach in Policy 8, in association with Policy 7, to assessing proposals for housing development in the
The countryside would be reasonable, and I am satisfied that there would be nothing in the terms of either criterion which would suggest that the policy would be likely to be used inappropriately to prevent housing on non-allocated sites where a shortfall in the land supply exists.

14. I note the contention that there are similarities between the requirements for eco-home proposals (figure 8.1, page 224 of the proposed plan) and huts. While there may be some common purpose between them, huts are not intended for permanent residential occupation. As such, they fall outwith the scope of Policy 8 and its supporting text, and there is no need to refer to them.

15. I am satisfied with the reference in Policy 8 to housing clusters as this is a well understood term which is frequently used in policies for housing in the countryside. I can also see no difficulty with the council’s definition of a housing cluster comprising a clearly defined grouping of 5 or more houses (up to a maximum of 24), which is set out in the supporting text at paragraph 6, page 223 of the proposed plan. Further helpful explanatory text on the council’s approach to housing clusters is provided in the same paragraph and at paragraph 8, and some examples of suitable housing proposals as part of clusters are shown at Figure 8, page 225. Inevitably, at the development management stage, some judgments will require to be taken on whether proposals for housing in the countryside constitute a housing cluster, but I consider that the proposed plan contains sufficient information to allow such judgments to be reasonably made. It also provides an appropriate level of guidance for applicants and other interested parties, which I do not consider too vague. In the circumstances, I am not persuaded that further clarity is required in the proposed plan on housing clusters, with the exception of the proposed addition to paragraph 15 of the supporting text, as set out below.

16. Criterion 3 of Policy 8 indicates that development of houses in the countryside will only be supported where it is for a new housing cluster that involves imaginative and sensitive re-use of previously used land and buildings. An explanation of this criterion is provided at paragraphs 15 and 16, page 223 of the proposed plan. Within the context that most new development should be directed to locations within and adjacent to settlements, I do not consider that it would be appropriate to remove the reference to housing cluster from either criterion 3 or paragraph 15 and replace it with the term housing development. This change could result in unacceptable housing proposals coming forward and being allowed in the countryside. As the criterion and supporting text are focussed on housing clusters, I believe that the reference in the same sentence to “smaller sites”, where such clusters are more likely to be proposed, to be reasonable. The council’s minimum threshold for a cluster has the benefit of helping to restrict inappropriately sited, isolated housing in the countryside.

17. I am concerned that the phrase in criterion 3 “imaginative and sensitive re-use” is vague, and does not in itself connect sufficiently well with the requirements of the supporting text. I believe that this can be overcome by better reflecting the terms of paragraph 15 in criterion 3, and adding a reference which requires housing clusters to achieve significant visual and environmental benefits. I do not consider that any further changes to the criterion are necessary, and that includes changing the wording to that proposed in the representations, which would only be likely to reduce the effectiveness of the policy in protecting the countryside from inappropriately new housing development.

18. In response to FIR 26, the council proposes various changes to the heading and
wording of paragraphs 15 and 16. The new heading would be “Re-use of previously
used Land and Buildings (Brownfield sites)”. The other changes would involve deleting
the phrase “In exceptional cases” from paragraph 15, replacing the word redevelop with
“develop” in the first line, changing “or” to “and” in the 3rd line, and inserting 2 new
sentences after the first sentence (which require it to be demonstrated that the site is no
longer required for its original purpose, and that it must be capable of accommodating a
housing cluster of at least 5 houses). I consider these changes to be appropriate
because they would generally help improve the connection between the terms of the
policy, particularly criterion 3, and the supporting text. They also now make clear that
the 2 paragraphs are concerned with brownfield sites, and this is helpful because
brownfield is defined in the glossary of the proposed plan. The proposed new sentences
in paragraph 15 provide useful information for users of the plan on how the policy is to
be approached, particularly criterion 3.

19. Criterion 6 of Policy 8 indicates that small scale affordable housing on the edge of a
settlement to address a shortfall in local provision consistent with Policy 2: Homes would
be supported. I acknowledge that the Applying Policy 8 section of the proposed plan
does not refer to affordable housing. However, given that the proposed plan should be
read as a whole, and that its policies are linked through Policy 1: Development
Principles, I am satisfied that there is sufficient detail in Policy 2 and the Applying
Policy 2 section, once the recommendations set out at Issue 2b are taken into account,
to guide the use of criterion 6 in assessing proposals. This includes broad guidance on
what is meant by an acceptable scale of housing, shortfalls in local provision, and site
selection. There is also a reasonable emphasis on the need to explore brownfield sites.
Affordable housing need is identified for housing market areas (and smaller
geographies), but not specifically for the countryside area as a whole. This is a
reasonable approach, and is not unusual. However, I am concerned at the different
wording used in criterion 6 and Policy 2 and its supporting text. The former refers to
“small scale” affordable housing on “the edge of a settlement”, and the latter to sites
“adjacent to settlement boundaries” and “development of a limited scale appropriate to
the setting and scale of the settlement.” In the interests of consistency, I consider that it
would be appropriate to adopt the wording used in the text associated with Policy 2. In
coming to this view, I have taken into account the responses to the related further
information requests and the conclusions and recommendations at Issue 2b.

20. I believe that it would introduce unnecessary detail into the proposed plan to add a
criterion into Policy 8 requiring Transport Assessments to analyse the effects of housing
developments where they may have an impact on the rail network. The council explains
that where developments have a significant effect on the transport network, including
rail, a Transport Assessment would be required, that applicants would be advised of this
requirement, and that Network Rail, as a statutory consultee, would be consulted on
proposals near railways. I believe this approach to be both proportionate and
reasonable. Given my conclusions in relation to Policy 7, I do not consider that the
wording in the second bullet at the end of the policy, which requires development to be
well located for available infrastructure and contribute to the need for any improvement,
is either lacking clarity or ambiguous.

21. The third bullet point at the end of Policy 8 requires that development must not
result in an overall reduction in the landscape and environmental quality of the area.
While I have some concerns about the clarity of the phrase “must not result in an overall
reduction” and how it would be used in practice, I am not persuaded that substituting it
with “will not result in a significant adverse effect” would be helpful and an improvement.
To align this bullet point with the underlying intention of Policy 8 and Scottish Planning Policy to protect natural heritage, and to phrase it positively to match the first 2 bullet points, I consider that it would be better if it required development to be located and designed to protect the overall landscape and environmental quality of the area.

Policy 7: Development in the Countryside contains the same 3 bullet points as Policy 8. To ensure consistency between the bullet points in the 2 policies, a consequential change to the third bullet point in Policy 7 is also required.

22. Overall, adjustments are required to the proposed plan, as set out below.

23. See also Issue 2b (Homes).

Policy 9: Green Belt

24. The proposed plan designates green belts around Dunfermline and St Andrews, as required by SESplan (Policy 12 [Dunfermline]) and TAYplan (Policy 3 [St Andrews]). In essence, Policy 9 of the proposed plan indicates that development in the green belts is required to conform to Policy 7: Development in the Countryside and Policy 8: Houses in the Countryside and, additionally, that it will only be supported if it is for development meeting a national requirement or established need, or provides essential infrastructure, with exceptions at 3 locations at St Andrews, which are listed. It also contains 5 criteria, which all developments proposed in the green belts should satisfy.

25. Scottish Planning Policy explains that a green belt around a town or city should support the spatial strategy by: directing development to the most appropriate locations and supporting regeneration; protecting and enhancing the character, landscape setting and identity of the settlement; and protecting and providing access to open space. It also indicates that local development plans should describe the types and scales of development which would be appropriate within a green belt, and sets out what these may include.

26. The council proposes changes to the policy which would delete the references to Policies 7 and 8 and set out a more comprehensive list of the types of development that would be supported. It also proposes the replacement of criterion 3 in the policy with a requirement that developments improve the landscape and environmental quality of the green belt, and a change to the first paragraph of the Applying Policy 9 section, which would result in only the relevant parts of the supporting text for Policy 8 being referred to rather than general references to both Policies 7 and 8.

27. Policy 9, as it stands in the proposed plan, lacks clarity on the exact extent of development that it would support because of the general references to Policies 7 and 8. By specifying the development types that would be supported, the proposed revision would provide a clearer policy for users of the proposed plan. The list of development types that would be supported is based on the list of appropriate development types set out in Scottish Planning Policy. While the council’s proposed list includes housing, this would only be supported in limited circumstances where it is for rehabilitation and/or conversion of complete or substantially complete buildings, and the demolition and replacement of a house. I do not consider such an addition unreasonable because the list in Scottish Planning Policy is not exhaustive, and housing developments of this nature can help improve the green belt. This proposed revision is supported by the proposed revision to the Applying Policy 9 section, which makes clear that Policy 8 is only relevant in so far as it relates to the list of development types contained in Policy 9.
In all the circumstances, I consider that the list of development types proposed in the revised policy is appropriate, and that it addresses some of the concerns expressed in the representations.

28. With the inclusion of this list in Policy 9, I consider that it is unnecessary to insert a requirement for all development to conform to Scottish Planning Policy, and SESplan and TAYplan. I acknowledge that Policy E17: Green Belt of the adopted 2012 St Andrews and East Fife Local Plan has such a requirement, but it does not contain a list of development types appropriate to the green belt. I consider that it would be unwise to include an explicit reference to renewable energy within the list of appropriate development types. Renewable energy is dealt with in the proposed plan at Policy 11: Low Carbon Fife. Both that policy, which should be generally supportive, and Policy 9 will require to be taken into account, and weighed in the balance, in assessing renewable energy proposals in the green belt. For onshore wind farms, this will include taking into account the spatial framework required by Scottish Planning Policy, which no longer highlights the green belt as an area of significant protection, but includes such an area, which is not to exceed 2km, around towns such as Dunfermline and St Andrews. If a renewable energy development proposal comes forward which meets a national requirement, it would clearly be covered by the development types which would be supported by the revised Policy 9.

29. Policy 2: Homes of the proposed plan deals in detail with the housing land supply and the process to be followed if a shortfall is shown to exist. The release of land from the green belt to overcome a housing land shortfall is not listed as a development type in the green belt, which would be supported by the revised policy, and this is consistent with the provisions of Scottish Planning Policy. Policy 9 explicitly supports housing development only in the limited circumstances outlined above, which I find to be appropriate. I can see nothing in the terms of the revised Policy 9 which would suggest that it could be used inappropriately to prevent acceptable housing development in the green belt. Where a shortfall in the housing land supply exists, planning applications for housing developments in the green belt would be assessed on their merits, against the range of policies in the development plan, including Policy 9 (and Policy 2) of the proposed plan.

30. Turning to the 5 criteria in Policy 9 (as it stands in the proposed plan), the green belt is a sensitive location, and I believe that the policy would be inappropriately weakened if the first line of the paragraph was changed from “development…must” to a requirement to merely “seek to demonstrate the following principles.”

31. Similarly, I consider that if criterion 2, which requires the setting and the key views from the historic cores of the 2 towns to be maintained, was changed to only demonstrating an appreciation of the setting and key views, it could risk undermining the requirement for green belts to support the spatial strategy of a development plan by, amongst other things, protecting and enhancing the character, landscape setting, and identity of a settlement. Bearing in mind this requirement and to properly reflect its terms, I agree with the council that criterion 3 should be changed by deleting the reference to “not detracting from, or resulting in depreciation to, the landscape and environmental quality of the green belt,” and replacing it with a reference to improving them. Within this context, I am not persuaded that the alternative proposed change to criterion 3, of only requiring that development did “not result in a significant adverse effect”, would be appropriate. With this proposed revision to criterion 3, I am satisfied that the 5 criteria in Policy 9 are appropriate. While concerns were expressed, I also
believe that they now reasonably echo the underlying intentions of the criteria used in the third paragraph of Policy E17: Green Belt of the 2012 St Andrews and East Fife Local Plan.

32. Overall, adjustments are required to the proposed plan, as set out below.

**Reporter's recommendations:**

I recommend that the following modifications be made:

1. In the policies part of the plan, pages 189-248, including Policy 7 Development in the Countryside, adjust where appropriate, the initial letter of any point or bullet to be lower case where the list of points or bullets should read as a single sentence.

2. In Policy 7 Development in the Countryside, page 219, adjust bullet point 3 at the end of the first part of the policy so that it reads:
   
   “…be located and designed to protect the overall landscape and environmental quality of the area.”

3. In Policy 7 Development in the Countryside, page 219, adjust point 3 at the end of the part of the policy dealing with prime agricultural land so that it reads:
   
   “…for the generation of energy from a renewable source or the extraction of minerals where this accords with other policy objectives and there is a commitment to restore the land to its former status within an acceptable timescale.”

4. In Policy 8 Houses in the Countryside, page 221, add to criterion 3 the following text, so that it reads:
   
   “…it is for a new housing cluster that involves imaginative and sensitive re-use of previously used land and buildings, achieving significant visual and environmental benefits;”

5. In Policy 8 Houses in the Countryside, page 221, adjust criterion 6 so that it reads:
   
   “…it is for small-scale affordable housing adjacent to a settlement boundary and is required to address a shortfall in local provision, all consistent with Policy 2 (Homes)”

6. In Policy 8 Houses in the Countryside, page 221, adjust criterion 7 so that it reads:
   
   “…a shortfall in the 5 year effective housing land supply is shown to exist and the proposal meets the terms of Policy 2 (Homes)”

7. In Policy 8 Houses in the Countryside, page 221, adjust bullet point 3 at the end of the policy so that it reads:
   
   “…located and designed to protect the overall landscape and environmental quality of the area.”
8. In the Applying Policy 8 section, page 223, adjust paragraph 15 and the heading immediately above, so that they read:

“Re-use of previously used Land and Buildings (Brownfield sites)

15. Planning permission may be granted to develop new housing clusters on smaller sites that are no longer required for their original purpose and which incorporate rundown or derelict buildings and where conversion to a residential use would bring about a significant environmental and visual improvement. The applicant will be required to adequately demonstrate that the site is no longer required for its original purpose. The proposed site must be capable of accommodating a housing ‘cluster’ of at least 5 houses. However, planning permission will only be granted where the redevelopment scheme would greatly benefit the site and the surrounding area in terms of its appearance, subject to the design, siting, and the environmental improvements proposed…”

9. In Policy 9: Green Belt, page 227 delete the first 2 paragraphs and the first line of the third paragraph, and insert the following text so that the policy reads:

“Policy 9: Green Belt

Development in designated green belt will only be supported where it:

1. is required for agricultural, horticultural, woodland or forestry operations;
2. is for retailing directly connected with agriculture and horticulture eg farm shops;
3. is for outdoor recreation uses compatible with an agricultural or natural setting;
4. is for intensification of established uses;
5. is for housing where it:
   (a) is for rehabilitation and/or conversion of complete or substantially complete existing buildings;
   (b) is for the demolition and subsequent replacement of an existing house (provided it complies with Policy 8, criterion 4);
6. is for essential infrastructure, such as digital communications and electricity grid connection, and no other suitable site is available; or
7. is for development meeting a national requirement or established need, if no other site is available.

The policy criteria above in 1-7 will apply, except at the following locations in the St Andrews Green Belt:

- Craigtoun Country Park…”

10. In Policy 9: Green Belt, page 227, delete criterion 3 in the fourth paragraph, and insert the following text so that the criterion reads:

“…3. improve the landscape and environmental quality of the green belt;…”

11. In the Applying Policy 9 section, page 228, delete paragraph 1 and insert the following text so that the paragraph reads:

“1. The Applying Policy text for Policy 8: Houses in the Countryside should be used, in part, in association with this policy: paragraphs 2-5, 10, 11-14, and 17-19.”
**Issue 2g**

**Low Carbon and Renewable Energy**

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**Body or person(s) submitting a representation raising the issue (including reference number):**

**Low Carbon and Energy**

- Tina Chapman (6)
- Scottish Natural Heritage (906)
- Hargreaves (2782)
- RSPB Scotland (2829)
- SEPA (3299)

**Policy 11: Low Carbon Fife**

- Giffordtown & District Community Council (280)
- Shell UK Limited (502)
- SEStran (712)
- Philip Hutchinson (901)

**Provision of the development plan to which the issue relates:**


**Planning authority’s summary of the representation(s):**

**Low Carbon & Energy**

Tina Chapman (6): Increasing the amount of alternative energy sources is commendable and valued. However the number of wind turbines gaining planning permission does not appear to provide the required energy in a sustained manner - other methods need to be explored.

Scottish Natural Heritage (906): notes that paragraph 20 of the strategy for Low Carbon and Energy identifies coastal opportunities for future growth associated with Energy Park Fife and the Fife Energy Corridor. As partners in the National Coastal Change Assessment Scottish Natural Heritage look forward to further discussion on this topic. With regards to preparation of existing guidance on wind energy in Fife, the majority of this work took place prior to the changes in SPP therefore Scottish Natural Heritage look forward to further discussion related to these national policy changes and have provided further advice in our comments on Policy 11.

Hargreaves (2782): confirm that the company supports the previous comments made in relation to the Main Issues Report in March 2013 in respect of the renewable energy opportunities which exist at both Westfield and St.Ninians as part of the re-development strategy for each site.
RSPB Scotland (2829): with regards Low Carbon and Energy (Paragraph 22 of Spatial Strategy section) RSPB welcome the development of a Fife Heat map to support the planning and deployment of local low carbon energy projects.

SEPA (3299): Paragraph 19 (Spatial Strategy section) Support in principle the concept of the development of a centre of excellence for the Renewable Energy Park at Methil and the Fife Renewable Innovation Centre. Paragraph 22 (Spatial Strategy section): welcome and support that the Council will ‘support proposals to develop district heating networks based on low carbon and renewable sources or that facilitate the more efficient use of heat from existing energy generation or other processes’.

Policy 11: Low Carbon Fife

Giffordtown & District Community Council (280): object to the proposed plan on following points:

- The plan relies heavily on Supplementary Guidance – especially in relation to wind energy. That particular guidance has already been adopted and proposes that almost the entire Howe should have the lowest level of protection from wind turbines.
- Supplementary Guidance introduces a 2 km protection zone around towns and villages, but not around smaller groups of houses. Consider that similar protection should be afforded the settlements in their area, indeed all settlements of more than 10 houses. This calls for a simple expansion of the wording in policy 11 to provide the same protection for such housing groups as has been offered for towns and villages (in your supplementary guidance).

Scottish Enterprise (1058): fully support the growth of the renewable energy, as a means of achieving the Scottish Governments targets for carbon reduction and also as a significant economic development sector and supports intentions to drive forwards the Fife Energy Corridor - Methil to Longannet. The Energy Corridor could be illustrated more clearly on Figure S3 (page 11), possibly using alternative annotation. Support also given to the important role to be played by Fife Energy Park and Rosyth port and immediate hinterland area in meeting the renewable energy targets and as national developments in NPF3 (attached).

Scottish Enterprise considers that all potential means to secure the economic development of available land should be pursued in the long term, including retaining a generous supply of available and potentially available land for employment uses within this Energy Corridor, beyond the timescale of this emerging Proposed Local Development Plan and future plans. Support the wider role of Fife Council in seeking to optimise its economic development potential and encourages the early preparation of a Development Framework for:

- the Energy Park Fife site to facilitate the implementation of the allocation as an industrial area and which will consider issues such as Maximum Design Parameters, parking strategy, etc., and
- Rosyth port and immediate hinterland area to secure energy related industrial development.
Both Development Frameworks should form the basis of Supplementary Guidance to be adopted in due course.

Ceres and District Environment and Amenity Protection Group (1814): Figures 11.2 and 11.1 (pages 234-235) setting out Spatial Framework and Landscape Capacity, which is essentially the Fife Landscape Capacity Assessment mapping overlaid with constraints where they occur, suggest that in addition a map showing Local Landscape areas would be appropriate.

Shell UK Ltd (502): have attached a statement of representation which requests that Policy 11 Low Carbon Fife and the proposed Wind Energy Supplementary Guidance, is amended to take into account the pipeline consultation zones that cross the Fife Local Development Plan Area. A detailed Statement of Representation is attached setting out the background and policy context for this matter, and would request that this Statement is taken into consideration as their full submission on this matter.

SEStran (712): Policy 11 ‘Low Carbon Fife’ could be strengthened by recognising the impact of transport on the carbon footprint, with some reference to:

- The promotion of Active Travel; and
- Infrastructure requirements for low carbon vehicles.

Philip Hutchison (901): objects to Wind Energy – Policy 11 as it should be expanded upon to provide the following additional protection:

- The 2km protection for town and villages will also be applied to large hamlets and well-defined groups of 10 or more houses.
- In cases where wind turbines of more than 50m (to blade tip) are proposed, greater protection may be applied.

Scottish Natural Heritage (918): With regards Low Carbon Energy Schemes Scottish Natural Heritage suggests that point 1 should include ‘views and visual amenity and local landscape designations’ as well as ‘landscape character’.

Landscape Capacity for onshore wind turbines - Figure 11.1 (page 234) of the Proposed Plan is entitled ‘Spatial Frameworks for Wind Turbines’. However, Scottish Natural Heritage’s reading and cross-referencing of this figure to the above mentioned capacity study and Supplementary Guidance suggests that it does not show any information other than landscape. If this figure is to be retained, suggest that it is either renamed or substituted with a figure which includes all information relevant to a spatial framework.

It would be helpful to clarify what is meant by ‘proposals that breach landscape capacity or cumulative impact thresholds shown in the diagrams’ (page 231). This terminology does not have wider currency so requires explanation. Suggest there should also be a reference to Local Landscape Designations in paragraph 6 (page 238).

It would be useful at paragraph 8 (page 232) of the explanatory text to provide a link to the current Wind Energy Supplementary Planning Guidance.

Jacobs (1207, 1196): have made the following comments:
SPP and Spatial Frameworks – Section 5 of Wind Energy Planning Supplementary Guidance (Wind Energy SPG) is inconsistent with the new standard for preparing Spatial Frameworks set out in Scottish Planning Policy (SPP), June 2014. In this regard, when defining areas of search FIFEplan should follow the approach set out in Table 1 (Spatial Frameworks) of SPP which restricts development only from Group 1 areas (National Parks and National Scenic Areas), whilst an ‘Area of Significant Protection’ is only applied to Group 2. In this regard it is unacceptable when defining the Broad Area of Search in Diagram 2 of Wind Energy to combine ‘Areas of Significant Protection’ and ‘least landscape capacity.’ Only Group 1 and 2 constraints should be shown on this Diagram.

Wind Energy SPG “Areas where Cumulative Impact limits further development” - The SPG identifies an overly precautionary threshold to limit to cumulative development, and applies this in a very broad brush way. This approach is shown not to be valid through the evidence set out in the Blairadam Wind Farm Landscape and Visual Impact Assessment (LIVA), a site specific assessment. The Ironside Farrar study acknowledges that the areas identified are indicative and confirms that specific proposals would require assessment relative to the objectives of the area. The identification of very approximate areas as a concrete policy consideration is therefore considered to be without foundation and entirely inappropriate, especially as a Stage 1 constraint.

Wind Energy SPG “Areas of significant protection and least landscape capacity” - The strategic broad brush judgments on landscape capacity should not be used to apply “Areas of significant protection and least landscape capacity” in Diagram 2. The Ironside Farrar study is not sufficiently detailed to accurately make these judgements and it is misleading and inaccurate to identify large areas as a concrete policy consideration.

Wind Energy SPG Cleish Hills SLA - The Landscape and Visual Impact Assessment (LIVA) prepared for Blairadam Wind Farm carefully considered the impact of the proposed development on the special qualities of the SLA and has concluded there would be no significant landscape effects on the Cleish Hills SLA. This reflects the findings of the landscape assessment on the Cleish Hills Uplands host LCA.

Policy 11 Low Carbon Energy Schemes - This element of the policy generally accords with the former SPP (2010) and the approach currently advocated in paragraph 169 of the current SPP. It is anticipated that a list of relevant matters is somewhat shorter than paragraph 169. It is suggested that the list of topics covered should be expanded to cover all the matters identified in paragraph 169 of the SPP; for example the policy currently does not cover impacts on natural heritage. The policy is framed in a generally negative way and does not allow for the balancing of positive aspects of this type of development. In addition, it is appropriate for the positive aspects to be weighed in the balance of compliance with the criteria based policy.

Policy 11 Sub-paragraph 5: "Afforested areas where there would be a reduction in tree cover" - Object to the way in which paragraph 5 is phrased. There is no presumption against the location of renewable infrastructure in afforested areas. The text subsequently in the plan in paragraph 9 in part reflects the national policy on forestry but is inconsistent with the specific wording of sub-paragraph 5.

Policy 11 Landscape Capacity for Onshore Wind Turbines and Reference to Figures 11.1 and 11.2 – This section of Policy 11 is not consistent with the Strategic
Development Plans. It does not set out a positive framework as required by SESplan or follow the criteria identified in TAYplan. It goes well beyond the requirements of these plans. This section is also not consistent with the former SPP nor the current SPP. It also is not consistent with the broad thrust of a positive framework for further renewable capacity as promoted by the NPF. It is considered that there are serious deficiencies relating to the policy framework set out in this section. This is not just a question of slightly altering wording. The whole approach of the Council to the formulation of the policy set out is not consistent with National Policy.

The policy also incorporates by reference the “Wind Energy Supplementary Guidance” which all proposals will be required to comply with, however any policy should be contained within the plan itself. The policy results in a policy framework that is highly restrictive and one which is not consistent with a positive promotion of further renewable energy and in particular onshore wind turbines.

Policy 11 Figures 11.1 (Spatial Framework for Wind Turbines) and 11.2 (Landscape Capacity and Cumulative Thresholds for Wind Turbines) - These figures represent an exercise that is non-compliant with the NPF and SPP. In broad terms Figure 11.1 (page 234) purports to illustrate the Stage 2 process advocated by the former SPP. Figure 11.2 (page 235) supposedly illustrates the Council's broad areas of search (Stage 3 of the former SPP). In fact, many of the areas depicted yellow as areas of highest capacity are identified in Figure 11.1 as being constrained. Even a brief examination of these two figures demonstrates the flawed approach of the Council to the spatial framework. When read as a whole, it appears that the policy, spatial framework and guidance could discourage, rather than promote renewable energy development in Fife, which is contrary to Scottish Government policy.

Rob Thomson (1360): Consideration should be given to adding and specifying two further "sensitive receptors" namely "Water table integrity" and "ground stability over Old Underground Works".

Forestry Commission (1440): Forest Enterprise Scotland (FES) have some concerns regarding policy 11, it presents landscape designations which are not in keeping and could adversely impact key aims and objectives which FES aspire towards in efforts to contribute towards delivery of the Scottish Forestry Strategy, Scottish Government policies & targets related to climate change/energy, and FES Strategic Plans - examples given within main representation of supporting Forestry Commission document extracts.

The designations of “Areas of significant protection” & “Landscapes with no capacity” covering Blairadam Forest is unjustified. Our understanding is, such designations were derived from the Ironside Farrar Study, Fife Onshore Wind Energy Review / Strategic Cumulative Landscape and Visual Impact Assessment, May 2013. The strategic broad brush statements should not be used to apply “Areas of significant protection and least landscape capacity” in Diagram 2. The Ironside Farrar study is not sufficiently detailed to accurately make these judgements.

Ceres and District Environment and Amenity Protection Group (1813): seeks a different form of wording following the heading Low Carbon Energy Schemes might take a more positive stance and have suggest modifications which are detailed below. With reference to Customer Guidelines: Renewable Energy in Fife - this document is out of date and refers to policies in a long since superseded Development Plan.
Greg Brown (1934): key point is that it is unacceptable to have "acceptable" and "unacceptable" as criteria for assessing compliance or otherwise of this policy. These terms lack definition, are obviously open to subjective interpretation and are therefore meaningless. There appears to be no explanation offered as to their interpretation either in the body of the policy or the narrative supporting it. Transparency and accountability in making judgements requires a clear framework. The problem in this policy could either be tackled by giving an explicit account of what factors will render impacts “acceptable” or “unacceptable”, to allow those words to be used or those words and the sentences containing them could be replaced with something offering a basis for transparent and standard based judgement.

Scottish Renewables (1997): Resubmission of comments made to Main Issues Report. In summary points/concerns raised are:

- Lack of consistency between supporting documents, supplementary guidance and the content of the Main Issues Report; are particularly concerned where it appears that policies have been created within SPG’s and not reflected within the Main Issues Report, and where there appears to be an inconsistency between the findings of the Ironside Farrar report and its application in policy.
- Scottish Renewables welcome Fife Council’s proposed plan to use heat mapping to ‘assist in identifying opportunities to exploit the potential of district heating systems and on-site renewable energy generation technologies.’
- Concerned by the lack of consideration given to offshore wind development and support local authorities’ requirement to prepare spatial frameworks for onshore wind developments above 20MW, which helps to guide projects into the most appropriate locations. However, have a number of concerns with the approach of the report and its adherence with Scottish Planning Policy and Guidance.
- Concerned that ‘proposed wind farm development’ appears to feature within this process despite Scottish Government Guidance clearly stating that within the first stage of preparing the spatial framework for onshore wind farms above 20MW, LPA’s should identify areas “Where the cumulative impact of existing and consented wind farms limit further development”.
- Concerns with the conclusion that wind farm group sizes should be limited to 1 -5 turbines, we believe that this is overly prescriptive and contrary to Scottish Planning Policy which states that “Development Plans should support all scales of development”.
- Further concerned with the lack of clarity around the turbine size categories used - Table 5.2 within the consultant’s report identifies four size categories – Small (Turbines less than 25m) Medium (25m <50m) Large (50m <100m) and very large (>100m). There is little definition around the reasons for identifying each category and this definition is not made apparent within earlier stages of the report, and given its inconsistency with other spatial frameworks could cause some confusion.
- Ironside Farrar report “Onshore Wind Strategy for Fife - Cumulative Impact Assessment” - Inclusion of table 6.1 – Summary of Landscape Capacity Study - the inclusion of table 6.1 appears to limit development of technologies in places where environmental or cumulative impacts could potentially be satisfactory. The current study appears to define the number of wind turbines that can be accommodated in the landscape rather than assessing the sensitivity of the landscape to accommodate development. We therefore urge the Council to remove such references from the document.
RSPB Scotland (2824): Low Carbon Energy Schemes, Page 231 - no mention of the ecological impacts when considering energy schemes. We suggest that ‘Habitats and Wildlife’ should be added to the list. RSPB Scotland would welcome a policy on cumulative impact of wind farms on biodiversity in addition to landscape. Cumulative impact on biodiversity should also be considered in adjoining council areas and a greater emphasis in policy that ensures studies of impacts are compatible across council areas.

The Woodland Trust Scotland (2850): The Local Development Plan should consider measures which contribute to both the mitigation of, and adaptation to climate change. In terms of climate change mitigation, policies and proposals should contribute to the effort to bring about significant reductions in greenhouse gas emissions to meet the targets set by the Scottish Government, at the very least.

Scottish Government (3213): Policy 11 (1) meets only the first of three aspects identified by the Scottish Government in the Fourth Annual Report on the Operation of Section 72 of the Climate Change (Scotland) Act 2009. The policy should be amended to include at least one increase in the proportion of emission to be saved. The policy should be further amended to ensure that it correctly refers to the emissions being saved through the use of low and zero-carbon generating technologies, as currently that appears to be optional.

Landscape Capacity for Onshore wind turbines - The policy should be revised to reflect the approach and spatial outcomes of Table 1 in the SPP (in tandem with a revised Figure 11.1). The first sentence of the policy should be deleted and be amended to read:

‘Figure 11.1 identifies those areas where wind farms will not be acceptable; areas of significant protection where wind farms may be appropriate in some circumstances where any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation; and areas with potential for wind farm development.’

‘Figure (number to be decided) identifies a number of significant local sensitive receptors to wind farm development, Figure 11.2 identifies landscape capacity and cumulative thresholds and the content of both will be used to assess wind farm applications.’

The third sentence can remain but a statement about the impact of the sensitive receptors on decision making would be useful to balance the policy intent.

Figure 11.1 should be revised to only identify those areas listed in SPP Table 1, in order to provide the national consistency required by SPP. Other constraints on wind farm development can be identified as development management considerations in the plan, in accordance with SPP paragraphs 163 and 169. The cumulative impact, capacity, aviation approach and radar, and television transmitters matters mapped on Figure 11.1 could be reproduced on a separate map (figure to be decided).

Policy 11 does not address strategic capacity for wind farms within the plan area, this is a requirement of paragraph 162 of Scottish Planning Policy, and could well result in an area that suitable for identification within the Spatial Strategy map S1.

District Heating – the Scottish Government note the lack of mapping which identifies heat network opportunities in Fife within this policy section; recommend that the policy
be amended to introduce a map of these opportunities as part of formal supplementary guidance on heat networks.

Development in the countryside (part relates to Policy 11) - consider the reference to the protection of prime agricultural land from solar arrays in paragraph 13 of Applying Policy 11: Low Carbon Fife should be reviewed on the basis that prime agricultural land should not be used to protect against visual impacts.

Scottish Environment Protection Agency (3291): supports the requirement for new development to demonstrate that facilities are provided for the separate collection of dry recyclable waste and food waste. Support the positive direction that low carbon energy schemes will be supported, subject to assessment of impact. Also support the inclusion of energy from waste within this section, and the supporting statements in paragraph 14, particularly the clear positive statements regarding the Council’s support for applications in line with the waste hierarchy, and the identification of the Council’s preference for location of new energy from waste developments. Support the inclusion of the section on District Heating and the supporting statements in paragraph 11 and 12 and welcome the development of the Fife Heat Map and its use as a tool in indicating where district heating development opportunities might be.

Support the inclusion of Sustainable Urban Drainage measures in delivering sustainable development, addressing both water quantity aspects (through controlling run-off rates) and protecting the water environment. Also welcome cross reference to policy 12; this provides a more integrated feel to the document as a whole. Scottish Environment Protection Agency however recommends that the sentence is amended to read. ‘Sustainable urban drainage measures will ensure that there will be no increase in rate of surface water run-off in peak conditions or detrimental on the ecological quality of the water environment’. We have also recommend a similar amendment to policy 12 ‘Flooding and the Water Environment’ to ensure consistency.

Modifications sought by those submitting representations:

Low Carbon & Energy

Tina Chapman (6): explore other methods of energy, other than wind turbines, which are more effectively responsive to user’s needs.

Policy 11: Low Carbon Fife

Giffordtown & District Community Council (280): seek expansion of the wording in policy 11 to provide the same protection, a 2 km protection zone around towns and villages, for such housing groups as has been offered for towns and villages (see Wind Energy Planning Supplementary Guidance June 2013).

Scottish Enterprise (1058): The Fife Energy Corridor, Methil to Longannet, could be illustrated more clearly on Figure S3 (Page 11 Spatial Strategy), possibly using alternative annotation. Development Frameworks for the Energy Park Fife and Rosyth port should form the basis of Supplementary Guidance.

Ceres and District Environment and Amenity Protection Group (1814): In addition to Figures 11.1 (Spatial framework for wind turbines – page 234) and 11.2 (Landscape
capacity and cumulative thresholds for wind turbines – page 235) seek an additional map showing Local Landscape areas.

Shell UK Ltd (502): request that Policy 11 Low Carbon Fife and the proposed Wind Energy Supplementary Guidance, is amended to take into account to the pipeline consultation zones that cross the Fife Local Development Plan Area.

SEStran (712): seek Policy 11 ‘Low Carbon Fife’ to be strengthened by recognising the impact of transport on the carbon footprint, with some reference to the promotion of Active Travel and infrastructure requirements for low carbon vehicles.

Philip Hutchison (901): seeks Policy 11 to be modified to provide the following additional protection:

- The 2km protection for town and villages will also be applied to large hamlets and well-defined groups of 10 or more houses.
- In cases where wind turbines of more than 50m (to blade tip) are proposed, greater protection maybe applied.

Scottish Natural Heritage (918): seek the following modifications:

Policy 11 “Low Carbon Energy Schemes” – point 1 should include ‘views and visual amenity and local landscape designations’ as well as ‘landscape character’.

Policy 11 “Landscape Capacity for onshore wind turbines” – If Figure 11.1 (page 234) is to be retained it is should be modified to either be renamed or substituted with a figure which includes all information relevant to a spatial framework.

Seek clarification on what is meant by ‘proposals that breach landscape capacity or cumulative impact thresholds shown in the diagrams’ (page 231).

Reference to be made to Local Landscape Designations in paragraph 6 (page 238).

Paragraph 8 (page 232) of the explanatory text should provide a link to the current Wind Energy Supplementary Planning Guidance.

Jacobs (1207, 1196): seek the following modifications:

SPP and Spatial Frameworks – Recommend the following approach advocated by the reporter in the Proposed South Lanarkshire Local Development Plan Inquiry:

“Applications for renewable energy infrastructure developments will be supported subject to an assessment against the principles set out in the 2014 SPP, in particular, the considerations set out at paragraph 169 and additionally, for onshore wind developments, the terms of Table 1: Spatial Frameworks. The council will produce statutory supplementary guidance which accords with the 2014 SPP, and which contains the spatial framework for onshore wind energy, and sets policy considerations against which all proposals for renewable energy infrastructure developments will be assessed.”

Wind Energy SPG “Areas where Cumulative Impact limits further development” - The designation indicating “Areas where cumulative impact limits further development” should be removed from Diagrams 1, 2 and 5.
Wind Energy SPG “Areas of significant protection and least landscape capacity” - The designation indicating “Areas of significant protection and least landscape capacity” should be removed from Diagram 2. Furthermore, the statements on the landscape capacity of the landscape character areas are insufficiently detailed to be referred to in the Wind Energy SPG.

Wind Energy SPG Cleish Hills SLA - It would be appropriate to avoid using the currently defined SLA boundaries in defining broad areas of search and in setting policy in FIFEplan. Furthermore, recommend that the current poorly drawn boundary to the Cleish Hills SLA is redefined to more closely reflect the core of the landscape which is to be protected. We recommend that the boundary is relocated further to the west to follow the original AGLV boundary, following the line of the A823 and the edge of the eastern edge of Lethans Muir and Outh Muir.

Policy 11 Low Carbon Energy Schemes - The list of criteria should be extended to comply with paragraph 169 of SPP. Policy should be revised to include ability to take into account positive aspects in weighing up overall compliance with the policy.

Policy 11 Sub-paragraph 5: “Afforested areas where there would be a reduction in tree cover” - Redraft paragraph 5 in terms which allow for those matters within the text. Alternatively, the criteria could be shortened to forestry as being a consideration that has to be satisfied.

Policy 11 Landscape Capacity for Onshore Wind Turbines and Reference to Figures 11.1 and 11.2 - This section of policy should be deleted. If the Council wish to incorporate a spatial framework within the plan they should undertake a further exercise which conforms to paragraph 163 of the SPP.

Policy 11 Figures 11.1 (Spatial Framework for Wind Turbines) and 11.2 (Landscape Capacity and Cumulative Thresholds for Wind Turbines) - Delete policy and figures. The Council should provide a spatial framework in accordance with paragraph 163 of the SPP.

Rob Thomson (1360) seeks modifications to add and specify two further "sensitive receptors" (page 232) namely "Watertable integrity" and "ground stability over Old Underground Works".

Ceres and District Environment and Amenity Protection Group (1813): suggest a different form of wording following the heading Low Carbon Energy Schemes might take a more positive stance and suggest the following :- “Development of low carbon energy schemes such as wind turbines, district heating, solar arrays, or energy from waste will be supported where they demonstrate that the development through good design, scale, siting individually or cumulatively will contribute to the maintenance of Fife’s landscape character and qualities, natural environment, towns, village, communities and other sensitive environmental receptors.”

Sensitive Receptors - Users of recreational facilities, core paths, golf courses, reservoirs for water sports and angling etcetera are in the top tier of sensitive receptors so we would suggest they merit a bullet point.

Reference to Customer Guidelines: Renewable Energy in Fife -this document is out of date and refers to policies in a long since superseded Development Plan.
Greg Brown (1934): requests that Fife Council take the phrase "significant detrimental impact" from Policy 10: Amenity, to replace "acceptable" and "unacceptable":

“Support for low carbon energy schemes such as wind turbines, district heating, solar arrays, or energy from waste will be conditional on the design, scale and siting contributing to the maintenance of the positive aspects of landscape, environment and residential amenity. Development will therefore be supported only where it does not result in significant detrimental impact, individually or collectively, on Fife's landscapes, natural environment, towns, villages and other sensitive receptors such as

- Occupied residential and institutional properties
- Major roads, railways, national and regional walking and cycle routes
- Defence and aviation interests
- Tourist attractions
- Historic buildings and conservation areas, and important viewpoints.

In considering energy schemes, the Council will have to be satisfied that there will be no significant detrimental impact on:

1. Landscape character
2. The appearance and character of the built heritage, such as listed buildings and conservation areas
3. The amenity of the occupiers of neighbouring properties in relation to visual impact and noise
4. Aviation, road and rail travel
5. Afforested areas where there would be a reduction in tree cover, and
6. The longer term use of the site by including acceptable decommissioning arrangements and restoration solutions, where relevant.”

RSPB Scotland (2824): suggests that ‘Habitats and Wildlife’ be added to list in Policy 11 “Low Carbon Energy Schemes”. Cumulative impact on biodiversity should also be considered in adjoining council areas and a greater emphasis in policy that ensures studies of impacts are compatible across council areas.

The Woodland Trust Scotland (2850): seeks consideration of measures which contribute to both the mitigation of and adaptation to climate change.

Scottish Government (3213): Policy 11 (1) should be amended to include at least one increase in the proportion of emission to be saved. The policy should be further amended to ensure that it correctly refers to the emissions being saved through the use of low and zero-carbon generating technologies, as currently that appears to be optional.

Landscape Capacity for Onshore wind turbines - The policy should be revised to reflect the approach and spatial outcomes of Table 1 in the SPP (in tandem with a revised Figure 11.1 – page 234). The first sentence of the policy should be deleted and be amended to read:

‘Figure 11.1 identifies those areas where wind farms will not be acceptable; areas of significant protection where wind farms may be appropriate in some circumstances where any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation; and areas with potential for wind farm development.’
‘Figure (number to be decided) identifies a number of significant local sensitive receptors to wind farm development, Figure 11.2 identifies landscape capacity and cumulative thresholds and the content of both will be used to assess wind farm applications.’

The third sentence can remain but a statement about the impact of the sensitive receptors on decision making would be useful to balance the policy intent.

Figure 11.1 should be revised to only identify those areas listed in SPP Table 1, in order to provide the national consistency required by SPP. Other constraints on wind farm development can be identified as development management considerations in the plan, in accordance with SPP paragraphs 163 and 169. The cumulative impact, capacity, aviation approach and radar, and television transmitters matters mapped on Figure 11.1 could be reproduced on a separate map (figure to be decided).

Policy 11 should be modified to address strategic capacity for wind farms within the plan area, this is a requirement of paragraph 162 of Scottish Planning Policy, and could well result in an area that suitable for identification within the Spatial Strategy map S1.

District Heating – the policy be amended to introduce a map which identifies heat network opportunities in Fife as part of formal supplementary guidance on heat networks.

Development in the countryside (part relates to Policy 11) - reference to the protection of prime agricultural land from solar arrays in paragraph 13 of Applying Policy 11: Low Carbon Fife should be reviewed on the basis that prime agricultural land should not be used to protect against visual impacts.

SEPA (3291): seeks modifications to Point 4 of Policy 11 “Sustainable Buildings” to read “Sustainable urban drainage measures will ensure that there will be no increase in rate of surface water run-off in peak conditions or detrimental on the ecological quality of the water environment’ and recommend a similar amendment to policy 12 ‘Flooding and the Water Environment’ to ensure consistency.

**Summary of responses (including reasons) by planning authority:**

**Low Carbon & Energy**

Tina Chapman (6): In addition to wind energy policy 6 “Low Carbon Schemes” refers to the development of a variety of low carbon energy schemes such as district heating, solar arrays, or energy from waste. It is Fife Council’s intention to update and adopt the Wind Energy Planning Supplementary Guidance (CD30). The Council are agreeable to expanding upon this guidance to include coverage issues for other low carbon energy schemes and incorporating reference to the supplementary guidance within the wording of the “Low Carbon Energy Schemes” section of Policy 11 and within the supporting text. The name of the Supplementary Guidance shall be amended to reflect these changes. Fife Council invites the Reporter to make an appropriate recommendation on this issue.

Scottish Natural Heritage (906); Hargreaves (2782); RSPB Scotland (2829), Scottish Environment Protection Agency (3299): support noted.
**Policy 11: Low Carbon Fife**

Giffordtown & District Community Council (280), Philip Hutchison (901): There are rural communities existent in each area which fall below the government’s defined threshold for the provision of buffer zones. The wind energy spatial framework and landscape capacity map are based on a strategic assessment and given the scale at which this has been produced it is only appropriate to consider impacts on larger villages and towns. Policy 11 states that in considering energy schemes the Council will require that ‘The amenity of the occupiers of neighbouring properties …’ is taken into account. In addition, the majority of these rural communities are protected by other constraints. The areas in North East Fife identified in Diagram 2 (page 31) of the Wind Energy Planning Supplementary Guidance (June 2013) (CD30) are constrained due to the proximity of Leuchars airbase where there are radar and low fly zone issues. There are also bird migration issues associated with pink footed geese and other species in this area that require detailed site specific assessment by developers. The area in southwest Fife is constrained by the proximity to the airport radar installations near Kincardine and at Edinburgh airport (page 32 section 6.0.1 Wind Energy Planning Supplementary Guidance (June 2013)) (CD30).

Scottish Enterprise (1058): note support for renewable energy growth. Figure S3 (page 11) of the proposed Local Development Plan provides an indicative strategic overview of the spatial strategy for Fife and proposals still require to be assessed against the policies of the plan through the development management process. Areas shown on strategic planning maps are intended to be approximate, providing information which guides developers to broad areas of search. Therefore in this instance no change in annotation is proposed.

Ceres and District Environment and Amenity Protection Group (1814): Additional maps including local landscape areas are included within the Wind Energy Planning Supplementary Guidance (June 2013) (CD30). Wind turbines proposals should comply with the Wind Energy Supplementary Guidance (CD30) which includes a spatial framework identifying those areas likely to be most appropriate for onshore wind farms, and includes policies and advice to guide communities and developers. The Council will update and adopt the guidance along with the Local Development Plan so that it becomes part of the development plan.

Shell UK Ltd (502): Wind turbines proposals should comply with the Wind Energy Planning Supplementary Guidance (June 2013) (CD30) which examines further issues relating to the proximity of wind turbines to sensitive installations (page 56 section 8.5). A number of pipelines cross Fife and appropriate stand-off distances will be determined in consultation with the operator and the Health and Safety Executive.

The Council will update and adopt the supplementary guidance along with the Local Development Plan so that it becomes part of the development plan.

SEStran (712) – Policy 3 “Infrastructure and Services” makes reference to local transport and access routes. The Council will expect development to promote opportunities for travel by more sustainable modes in the following order of priority: walking, cycling, public transport, cars. The emerging Making Fife’s Places Policy Guidance includes advice on designing developments to be resource and energy efficient and to encourage the use of sustainable transport.
Scottish Natural Heritage (918): The Council agrees with the need to protect views and visual amenity and local landscape designations as well as landscape character. The Policy refers to the need to address impact on sensitive receptors, which are listed as including important viewpoints. These issues are also covered in depth in the Wind Energy Planning Supplementary Guidance (June 2013) (CD30) and the emerging Making Fife’s Places Policy Guidance (CD51). These two references make the need to have an additional reference in Policy 11 unnecessary. Therefore no change is proposed.

In addition to information on the landscape Figure 11.1 “Spatial framework for wind turbines” illustrates additional constraints such as aviation constraints, RAF Leuchars exclusion zones, television transmitters etc.

Reference to landscape capacity for onshore wind turbines should be read in conjunction with the Wind Energy Planning Supplementary Guidance (June 2013) (CD30) which further details capacity or cumulative impact thresholds. Policy 11 cross references the supplementary guidance and requires all onshore wind energy applications to comply with the detailed guidance.

Jacobs (1207, 1196)

SPP and Spatial Frameworks – Due to the timing of the Local Development Plan and the publication of the new Scottish Planning Policy (CD1), the Proposed Plan is significantly based on the 2010 version of Scottish Planning Policy (CD57). However, the wording of the plan does conform to both as it addresses the transition to a low carbon economy and helps deliver the aims of the Scottish Government.

Wind Energy SPG “Areas where Cumulative Impact limits further development” – The designation should be retained. The response seems to imply that cumulative impacts are not a key issue and the strategic scale of the Ironside Farrar study (see core documents CD41, CD42 and CD43) rules it out from being used to assist in policy implementation. Given the distance over which wind turbines can have an impact it is important that these studies are carried out over a strategic scale. Also, it is important that cumulative impacts are considered at this scale as these assessments cannot be carried out solely alongside individual applications.

The areas with highest inherent capacity to accommodate wind turbines are determined through the landscape character and value based sensitivity assessment. The areas indicating where cumulative impact limits development are determined by assessment of the extent of current consented wind energy development. We consider that this is a more transparent way of showing the interaction of factors that control the potential for development than simply indicating ‘limited capacity’.

The Blairadam Assessment does not show that the spatial diagrams in the LDP are inappropriate or wrong but the result of an assessment being carried out at a different scale and taking into account more local issues.

Wind Energy SPG “Areas of significant protection and least landscape capacity” - Fife Council is satisfied that the approach taken in the Ironside Farrar report (see core documents CD41, CD42 and CD43) and the recommendations made are consistent with the spirit of national policy. Planning policy and guidance requires local authorities to prepare a spatial strategy. We are therefore satisfied that a strategic level landscape
capacity and cumulative impact assessment is of the correct scale and detail to inform a Fife-wide strategy. The results of the assessment clearly indicate in table 2 (pages 22 – 30 of the Wind Energy Planning Supplementary Guidance (June 2013)) (CD30) where there is capacity for development and specifically where there is remaining capacity. Whilst we accept that there can be disagreement with the scope, method or findings of the report, we do not accept that it is “misleading and inaccurate”. No site specific conclusions should be drawn from it in relation to currently proposed or potential future wind turbines and windfarms.

Wind Energy SPG Cleish Hills SLA – Areas shown on strategic planning maps are intended to be approximate, providing information which guides developers to broad areas of search. This is explained in the Ironside Farrar report (see core documents CD41, CD42 and CD43). More detailed description is then given in the written report on specific areas.

Policy 11 Low Carbon Energy Schemes – The policy provides an overview of criteria that an application will be assessed against; any applications will be required to comply with detailed guidance provided in the Wind Energy Supplementary Guidance (CD30). The Council will update and adopt the Guidance along with the Local Development Plan so that it becomes part of the development plan.

Policy 11 Sub-paragraph 5: “Afforested areas where there would be a reduction in tree cover” - The point about adding a reference to Policy 11 “Low Carbon Schemes” under Part B Criteria 5 makes sense, as wind farms and other energy generation technologies are often acceptable in the countryside. Fife Council considers that there is merit including this reference and invites the Reporter to make an appropriate recommendation on this issue.

Policy 11 Landscape Capacity for Onshore Wind Turbines and Reference to Figures 11.1 and 11.2 – The approach taken by the Council in preparing the Wind Energy Supplementary Guidance (CD30) meets the requirements of SPP 2010. There are no serious deficiencies in the approach and it is consistent with the National Planning Framework. Due to the timing of the publication of SPP 2014 it was not possible to reflect all its requirements, particularly with regard to the spatial framework mapping. However the approach of the policy in FIFEplan corresponds as closely as possible to the requirements of SPP 2014 and sets a positive approach to promoting renewable technologies.

It should be noted that the Council does not agree with the approach in SPP 2014 to identifying spatial frameworks. The methodology set out in SPP 2014 for identifying spatial frameworks results in the identification of areas as having capacity for turbines, where it would be least appropriate to site them. While achieving consistency in methodology across Scotland is a laudable aim it is not appropriate to eliminate from strategic consideration issues such as impacts on Fife’s landscape and environment. Impact on landscape is the number one issue that determines the suitability of on shore wind turbine applications and is the most common ground for objection to development proposals.

The Local Development Plan approach is one which promotes renewable energy technologies but also highlights the issues that applications must address. The response is correct in that some areas the policy is restrictive due to the cumulative impact on landscape and the breaching of landscape thresholds put in place through the
Supplementary Guidance (CD30) and Figure 11.1 and 11.2. This is in line with SPP which looks to promote renewable energy technology in a sustainable manner and address impacts on the landscape and communities.

Areas shown on strategic planning maps are intended to be approximate, providing information which guides developers to broad areas of search. This is explained in the Ironside Farrar report (see core documents CD41, CD42 and CD43). More detailed description is then given in the written report on specific areas. In this instance no change is proposed.

Policy 11 Figures 11.1 (Spatial Framework for Wind Turbines) and 11.2 (Landscape Capacity and Cumulative Thresholds for Wind Turbines) - Areas shown on strategic planning maps are intended to be approximate, providing information which guides developers to broad areas of search. This is explained in the Ironside Farrar report (see core documents CD41, CD42 and CD43). More detailed description is then given in the written report on specific areas. In this instance no change is proposed.

Rob Thomson (1360): The list of sensitive receptors provided within Policy 11 is not an exhaustive list and the requirements of this process will be agreed with the Council through the pre-application process. Therefore no change is proposed.

Forestry Commission (1440): Landscape capacity is one of a number of key considerations in developing a spatial strategy for wind energy development. A study of capacity of the Fife landscape to accommodate wind turbine/wind farm developments was undertaken by Ironside Farrar. The Ironside Farrar assessment “Fife Onshore Wind Energy Review- Strategic Cumulative Landscape and Visual Impact Assessment” (see core documents CD41, CD42 and CD43) provided a comprehensive and informed update to Fife Council’s wind energy spatial strategy. It is considered an important tool in the context of assessing wind turbine developments and the Council will continue to have regard to the findings of the study when assessing all proposals for wind energy developments in Fife.

The Blairadam Assessment does not show that the spatial diagrams in the LDP are inappropriate or wrong but the conclusion of an assessment being carried out at a different scale and taking into account more local issues. Table 2 (pages 22-30 of the Wind Energy Planning Supplementary Guidance (June 2013)) (CD30) provides a summary breakdown of Fife’s landscapes and their ability to accommodate wind energy development. Acceptable thresholds for landscape change to accommodate wind energy development in Fife are identified on Diagram 8 (page 86 of the Wind Energy Planning Supplementary Guidance (June 2013)) (CD30) and outlined in greater detail in Table 2.

Ceres and District Environment and Amenity Protection Group (1813): Comments on rewording of Policy 11 noted and in this instance no change is proposed as the proposed change seems to provide a similar level of policy protection as is currently in FIFEplan.

The list of sensitive receptors provided within Policy 11 is not an exhaustive list and the requirements of this process will be agreed with the Council through the pre-application process. Therefore no change is proposed.
It is the Council’s intention to update and adopt the supplementary planning guidance, including diagrams, along with the Local Development Plan so that it becomes part of the development plan.

Greg Brown (1934): Comments on rewording of Policy 11 noted. The wording is appropriate and not open to mis-interpretation as the wording refers to the fact that decisions will be based on the Council’s judgement on developments and what is appropriate or inappropriate. As detailed within Policy 11, all applications will be subject to appropriate environmental impact screening and scoping before submission of a planning application. In most cases, detailed supporting information will be needed to examine impacts and how these will be limited. Further information on how applications are assessed is set out within Customer Guidelines: Renewable Energy in Fife (SD2). In this instance no change is proposed.

Scottish Renewables (1997): Comments refer to previous stage with the Local Development Plan process and as such may be outdated. The approach taken by the Council in preparing the Wind Energy Supplementary Guidance (CD30) meets the requirements of SPP 2010. There are not serious deficiencies in the approach and it is consistent with the National Planning Framework. Due to the timing of the publication of SPP 2014 it was not possible to reflect all its requirements, particularly with regard to the spatial framework mapping. However the approach of the policy in FIFEplan corresponds as closely as possible to the requirements of SPP 2014 and sets a positive approach to promoting renewable technologies.

Scottish Renewables (1997) refer to previous stage with the Local Development Plan process and as such may be outdated. The approach taken by the Council in preparing the Wind Energy Supplementary Guidance (CD30) meets the requirements of SPP 2010. There are not serious deficiencies in the approach and it is consistent with the National Planning Framework. Due to the timing of the publication of SPP 2014 it was not possible to reflect all its requirements, particularly with regard to the spatial framework mapping. However the approach of the policy in FIFEplan corresponds as closely as possible to the requirements of SPP 2014 and sets a positive approach to promoting renewable technologies.

Upon adoption of the Local Development Plan the existing Fife Council Wind Energy Guidance (CD30) will need to be updated again to reflect the position taken by Government ministers during examination of the Plan. The supplementary planning guidance is currently non-statutory planning policy guidance but will become statutory “supplementary guidance” subject to Scottish Ministers’ scrutiny when the Local Development Plan is adopted and will then have greater policy status than existing guidance. This cannot take place in advance of publication of the Local Development Plan and therefore updates to existing guidance remain relevant to current development plan policy in the Adopted Fife Local plans and the approved Strategic Development Plans.

Proposals for commercial wind farms will be considered in the context of the strategic and local planning policies, the supplementary guidance document (CD30) and the Ironside Farrar report (see core documents CD41, CD42 and CD43) which provides an evidence base on the capacity of the Fife landscape to accommodate wind farm development and an up to date position on cumulative landscape and visual impacts. The landscape capacity assessment divides Fife into its landscape character units. Each landscape character area has an anticipated acceptable scale of development in terms of the likely acceptable turbine heights and acceptable scales of development as well as providing advice on separation distances.

The supplementary guidance also defines maximum thresholds of landscape change across Fife to manage and limit the amount of development that will be allowed to take place. This will be a material consideration in determining planning applications for wind turbines/wind farms. However each proposal will be considered on its merits on the basis of more detailed, site specific, assessments of the landscape capacity.
There is no current “accepted” classification of the scale of windfarms in Scotland. Existing and proposed wind energy developments vary in turbine numbers and turbine sizes. For the purposes of the Fife Onshore Wind Energy Review and subsequent Supplementary Guidance, the wider Scottish context of wind energy development was considered. In carrying out the review Ironside Farrar adopted wind energy development scale categories related wherever possible to published guidance or planning application procedures. Further guidance is given in Scottish Natural Heritage’s Siting and Designing Windfarms in the Landscape (Version 2 May 2014) publication (see supporting document SD1).

With regards to cumulative impact assessments for onshore wind, the areas with highest inherent capacity to accommodate wind turbines are determined through the landscape character and value based sensitivity assessment. The areas indicating where cumulative impact limits development are determined by assessment of the extent of current consented wind energy development at the time proposals are being assessed. We consider that this is a more transparent way of showing the interaction of factors that control the potential for development than simply indicating ‘limited capacity’.

RSPB Scotland (2824): The list of impacts provided within Policy 11 is not an exhaustive list and the requirements of this process will be agreed with the Council through the pre-application process. The Wind Energy Planning Supplementary Guidance (June 2013) (see CD30 section 8.8 pages 61-64) states that wind turbine/wind farm developments will not be supported in designated natural heritage protection areas including Ramsar sites, Special Areas of Conservation, Special Protection Areas and Sites of Special Scientific Interest or in locations, advised to Fife Council by Scottish Natural Heritage, which play a supporting role to these designated areas.

Long stretches of the Fife Coastline and one inland site are designated Natura 2000 sites and proposals which could affect the qualifying habitats and qualifying species are likely to require to be the subject of an appropriate assessment. An assessment of the effect on qualifying species of Natura 2000 sites in adjacent authority areas will also be required. Care will be needed by all wind energy development proposals to ensure there are no unacceptable impacts upon the integrity of Fife’s natural environments. The Council will update and adopt the guidance along with the Local Development Plan so that it becomes part of the development plan.

The Woodland Trust Scotland (2850): Policy 11 promotes more sustainable generation and energy efficient buildings. The Council will support proposals to develop district heating networks based on low carbon and renewable sources, or that facilitate the more efficient use of heat from existing energy generation or other processes.

Scottish Government (3213): Fife Council contributes to the Climate Change (Scotland) Act 2009 target of reducing greenhouse gas emissions by at least 80% by 2050. Energy resources are harnessed in appropriate locations and in a manner where the environmental and cumulative impacts are within acceptable limits. The supporting text to Policy 11 states that proposals for new development must accord with the current carbon dioxide emissions reduction target (as set out by Scottish Building Standards) and also demonstrate that at least half of this reduction will be met through low and zero carbon technologies. Generating technologies should contribute towards a proportion of these savings. (Page 232). However to address the issues raised in this response Fife Council is willing to make a change to the wording of Policy 11 “Sustainable Buildings” to the following, and if agreed these amendments shall be reflected within the supporting
1. The proposal meets the current carbon dioxide emissions reduction target (as set out by Scottish Building Standards) and that generating technologies will contribute at least 15% of these savings from 2016 and at least 20% from 2020.

Landscape Capacity for Onshore wind turbines – Fife Council considers that there is merit in elements of the wording, with amendments, suggested in the representation and invites the Reporter to make an appropriate recommendation on this issue.

“All applications for wind turbines will also be assessed against Figure 11.1. This identifies those areas where wind farms will not be acceptable; areas of significant protection where wind farms may be appropriate in some circumstances where any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation; and areas with potential for wind farm development, all subject to further detailed assessment as part of the planning application process.”

With regard to revising Figure 11.1 to ‘…..only identify those areas listed in SPP Table 1’ …The approach taken by the Council in preparing the Wind Energy Supplementary Guidance meets the requirements of SPP 2010. There are no serious deficiencies in the approach and it is consistent with the National Planning Framework. Due to the timing of the publication of SPP 2014 it was not possible to reflect all its requirements, particularly with regard to the spatial framework mapping. However the approach of the policy in FIFEplan corresponds as closely as possible to the requirements of SPP 2014 and sets a positive approach to promoting renewable technologies.

Strategic capacity for wind farms is considered within the Wind Energy Planning Supplementary Guidance (June 2013) (CD30) which is cross referenced in Policy 11. This guidance will be updated again to reflect the position taken by Government ministers during examination of the Plan. At this time the supplementary planning guidance will become “supplementary guidance” under the terms of the new planning act and will have greater policy status than existing guidance. This cannot take place in advance of publication of the Local Development Plan and therefore updates to existing guidance remain relevant to current development plan policy in the Adopted Fife Local plans and the approved Strategic Development Plans.

District Heating – The Fife Heat Map is referenced within the supporting text to Policy 11 and a link provided to the heat map website. Given the complexity and layers of the map it is not deemed appropriate to include it within the body of the plan. The website is continuously updated and therefore more accurate, the interactive design of which is more suited to an online plan.

Development in the countryside (part relates to Policy 11) - All solar array proposals should be considered on their own unique locational and design characteristics as well as their strategic context. All proposals should be subject to consideration of landscape, visual and cumulative impact assessment including (if required) a full environmental assessment. Therefore no change is proposed.

Scottish Environment Protection Agency (3291) – Fife Council considers that there is merit in the amended wording in Policy 11 “Sustainable Buildings” point 4 to read: “Sustainable urban drainage measures will ensure that there will be no increase in the rate of surface water run-off in peak conditions or detrimental impact on the ecological
quality of the water environment” and invites the Reporter to make an appropriate recommendation on this issue.

Reporter’s conclusions:

Low Carbon and Energy

1. The proposed plan in setting out its spatial strategy highlights the importance of the Fife Energy Corridor as an area of regional importance for the energy sector, the proposal at the University of St Andrews for low carbon and sustainable energy related research, development and industry, the Energy Park at Methil and the biomass proposal at Rosyth, and the development of energy efficient buildings and heat networks. Given these references in the plan to a variety of projects covering various renewable energy sources, I am satisfied that the spatial strategy appropriately supports the development of a diverse range of electricity generation from renewable energy technologies and the development of heat networks all in line with the approach of Scottish Planning Policy and National Planning Framework 3.

2. I note the concern expressed about the number of turbines being granted planning permission. However, Scottish Planning Policy and National Planning Framework 3 both expect wind energy to remain an important renewable energy source. I therefore consider that the reference in the spatial strategy to wind energy being an important element of providing a mix of renewable energy is reasonable and appropriate.

3. On the basis of the representations made to the low carbon and energy section of the spatial strategy, no adjustments are required to the proposed plan. However, consequential adjustments are required as a result of the representations made to Policy 11: Low Carbon Fife, and I deal with these below.

Policy 11: Low Carbon Fife

4. I deal with Issue 2j in these conclusions, in so far as it relates to renewable energy, in order that I can consider matters relating to such developments as a whole.

5. Policy 11 and its supporting text (pages 231-233) set out the way in which the council proposes to contribute to the 2009 Climate Change (Scotland) Act target of reducing greenhouse gas emissions by at least 80% by 2050. It sets out the approach to be taken to developing sustainable buildings, low carbon energy schemes and district heating, and deals with landscape capacity for onshore wind farms. The proposed plan also contains 2 related figures, one of which provides a spatial framework for wind turbines, and the other provides landscape capacity and cumulative thresholds for wind turbines (and seeks to show broad areas of search). Policy 1, Parts B7 and C8: Development Principles provide a gateway to Policy 11. The development principle set out at Part B7 requires development proposals to safeguard the character and qualities of the landscape, and Part C8 requires them to provide for energy conservation and generation in their layout and design.

Sustainable Buildings

6. The section of the policy on sustainable buildings sets out 5 criteria that new developments are required to satisfy. Criterion 1 is related to developments meeting the
carbon dioxide emissions reduction target, and criterion 4 is related to providing appropriate sustainable urban drainage measures. There is an additional requirement to encourage and facilitate the use of sustainable transport.

7. Section 72 of the 2009 Climate Change (Scotland) Act inserted a new section 3F into the 1997 Town and Country Planning (Scotland) Act (as amended), which requires local development plans to include policies designed “to ensure that all new buildings avoid a specified and rising proportion of the projected greenhouse gas emissions from their use... through the installation and operation of low and zero carbon generating technologies.” Scottish Planning Policy has introduced a presumption in favour of development that contributes to sustainable development, and it has set an outcome of achieving a low carbon place through reducing carbon emissions and adapting to climate change. It indicates that by seizing opportunities to encourage mitigation and adaptation measures, planning can support the transformational change required to meet emission reduction targets and influence climate change. It also indicates that planning can influence people’s choices to reduce the environmental impacts of consumption and production.

8. The council proposes to change criterion 1 of the sustainable buildings part of Policy 11, and its supporting text. The change would require proposals to meet the current carbon dioxide emissions target (as set out by Scottish Building Standards), with generating technologies contributing at least 15% of the savings from 2016 and at least 20% from 2020. On the face of it, the proposed changes would mean that the proposed plan would better reflect the requirements of section 3F by referring to an increase in the proportion of emissions to be saved, and by referring to the emissions being saved through generating technologies. To make the criterion itself clearer, I consider that it should describe the generating technologies as low and zero carbon. The changes to the supporting text proposed by the council in response to FIR 57 appropriately reflect the revised criterion. Furthermore, they reasonably indicate that supplementary guidance is necessary to provide additional information on how to demonstrate compliance with the requirements. This should also be referred to in the policy itself. The guidance should be prepared as soon as possible after the date of the adoption of the plan. In the circumstances, I am satisfied that, with the additional amendments set out, the changes proposed by the council are acceptable.

9. The Water Framework Directive (2000/60/EC) seeks to protect, improve and promote the sustainable use of the water environment. River basin management plans are a requirement of the Directive. The overall aim of river basin planning is for all waters to be in good ecological condition. Circular 6/2013: Development Planning requires planning authorities to have regard to river basin management plans. In the circumstances, I consider that the planning authority’s proposal to change criterion 4 of the sustainable buildings part of Policy 11 to require that sustainable urban drainage measures have no detrimental impact on the ecological quality of the water environment is necessary and appropriate. This change would ensure that criterion 4 was consistent with the Water Framework Directive.

10. Scottish Planning Policy indicates, amongst other things, that plans should promote opportunities for travel by more sustainable modes in the following order of priority: walking, cycling, public transport, cars. The council’s draft supplementary guidance on “Making Fife’s Places” refers to good pedestrian and cycle connections, and access by public transport. I believe that there is merit in changing Policy 11 to highlight this important hierarchy of travel modes, which promotes active travel. I am not persuaded
that it is necessary to refer to infrastructure requirements for low carbon vehicles in the proposed plan. I note that the draft supplementary guidance encourages electric vehicle recharging infrastructure in new developments, and I am satisfied that this is an appropriate place for dealing with this type of detail.

Low Carbon Energy Schemes and Landscape Capacity for Onshore Wind Turbines

11. The section of the policy on low carbon energy schemes includes 6 criteria on which the council will require to be satisfied, and it provides support for such proposals provided they do not result in unacceptable impacts on sensitive environmental receptors. The section of the policy on landscape capacity for onshore wind turbines indicates that proposals breaching the landscape capacity or cumulative impact thresholds, and those not complying with the Wind Energy Supplementary Guidance, will not be supported.

12. The current Scottish Planning Policy was published in June 2014. It set out a new approach on spatial frameworks for onshore wind farms, and includes considerations that are likely to be taken into account in assessing energy infrastructure development proposals. The council was aware of the current Scottish Planning Policy before it prepared its schedule 4 responses to the representations on Policy 11. It acknowledges, through the schedule 4 responses, that its spatial framework for wind turbines (Figure 11.1) is inconsistent with the requirements of Scottish Planning Policy, but puts forward no proposals to make the framework consistent. However, the council is proposing some minor changes to the policy and text. In response to FIR 58, the council provided a diagram showing a further spatial framework and, in response to FIR 58b, it provided some details of the approach it had taken in preparing the further framework, and it explained its approach to supplementary guidance on low carbon. The representors had the opportunity to comment on both FIRs.

13. The background to these sections of Policy 11 is relevant in considering the representations. The council seeks to base its approach on the now superseded 2010 Scottish Planning Policy, which indicated that planning authorities should support the development of a diverse range of renewable energy technologies, guide development to appropriate locations, and provide clarity on the issues that will be taken into account when specific proposals are assessed. National policy focussed on wind energy, and indicated that planning authorities should support the development of wind farms in locations where the technology can operate efficiently and environmental and cumulative impacts can be satisfactorily addressed. It stated that development plans should provide a clear indication of the potential for development of wind farms of all scales, and that they should set out the criteria that would be considered in deciding applications. It also indicated that the development plan should set out a spatial framework for onshore wind farms of over 20MW, which could include wind farms of less than 20MW, if that was considered appropriate. The framework should identify areas requiring significant protection, areas with potential constraints, and areas of search.

14. The 2012 TAYplan supports the switch to a low carbon economy by providing for appropriate infrastructure and improving resilience to climate change and other potential risks, and it seeks to strengthen the economic base of the strategic development plan area to support the renewable energy and low carbon sectors. Policy 6: Energy and Waste/Resources Management Infrastructure, states that local development plans should identify areas that are suitable for different forms of heat and electricity infrastructure, and that plans and proposals should ensure that all areas of search,
allocated sites, routes and decisions have been justified, at a minimum, on the basis of 9 considerations. These include: the specific land take requirements for the infrastructure technology and associated statutory safety exclusion zones where appropriate; anticipated effects of construction and operation on noise, surface and ground water pollution, and radar installations and flight paths, amongst others; sensitivity of landscapes, the water environment, biodiversity, tourism, and recreational access, amongst others; cumulative impacts; and consistency with the National Planning Framework and its action programme.

15. The 2013 SESplan states, at Policy 1B: The Spatial Strategy: Development Principles, that local development plans will contribute to the response for climate change through mitigation and adaptation. Regarding energy, it explains that local development plans should promote the use of renewable energy, and should encourage development that will contribute towards national renewable energy targets. It indicates that consideration of location, landscape, environmental quality, and community impacts will be required for onshore developments, and it acknowledges that concerns have been expressed about cumulative impacts. Policy 10: Sustainable Energy Technologies, states that the strategic development plan seeks to promote sustainable energy sources, and that local development plans will set a framework for the encouragement of renewable energy proposals, that aims to contribute towards achieving national targets for electricity and heat, taking into account relevant economic, social, environmental and transport considerations, and to facilitate more decentralised patterns of energy distribution and supply.

16. In June 2013, the council brought forward planning supplementary guidance on wind energy, the second update of its wind energy guidance. The guidance seeks to bring the council’s approach to wind energy in line with the 2010 Scottish Planning Policy. It sets out guidance for wind farms over 20MW, wind turbine clusters of less than 20MW, and single turbines. The council indicates that it is keen to promote renewable energy opportunities, in appropriate locations. The guidance contains a spatial framework for wind turbines (which is included in the proposed plan), and provides details of the policy considerations.

17. In November 2012, the council completed a study on strategic landscape capacity and cumulative impact (an Onshore Wind Energy Strategy for Fife, Cumulative Impact Assessment). The study looked at the ability of the Fife landscape to accommodate onshore wind energy development, taking into account matters such as landscape character and visual sensitivity, and a number of constraints (including local landscape designations). It suggested levels of landscape capacity for 3 different heights of turbine ([25-50m], [50-100m], [and >100m]), and it concluded that there are no landscape areas of Fife suitable for development of extensive wind farms with large scale turbines. It provided a map showing the levels of landscape capacity across the plan area, and included 3 areas affected by cumulative landscape impacts. The study informed the approach taken to wind energy in the proposed plan.

18. The current Scottish Planning Policy indicates that development plans should seek to ensure that an area’s full potential for electricity and heat from renewable sources is achieved, in line with national climate change targets, giving due regard to relevant environmental, community and cumulative impact considerations. Local development plans should set out the factors to be taken into account in considering proposals for energy developments. These would be likely to include the following factors listed in paragraph 169: net economic impact; the scale of contribution to renewable energy
19. The current Scottish Planning Policy explains that the spatial framework should be set out in the development plan, identifying those areas that are likely to be most appropriate for onshore wind farms, following the approach set out in table 1, and indicating the minimum scale of development that the framework is intended to apply to. Table 1 divides the spatial framework into 3 groupings: (1) areas where wind farms will not be acceptable (National Parks and National Scenic Areas); (2) areas of significant protection (national and international designations; other nationally important mapped environmental interests; and community separation (an area around cities, towns, and villages identified in the local development plan); and (3) areas with potential for wind farm development (beyond groups (1) and (2) where wind farms are likely to be acceptable, subject to detailed consideration against identified policy criteria). This approach requires to be followed in order to deliver consistency nationally. Additional constraints should not be applied at this stage. Areas identified for wind farms should be suitable for use in perpetuity.

20. The current Scottish Planning Policy indicates that development plans should identify areas capable of accommodating renewable electricity projects in addition to wind generation, including hydro-electricity generation. It also states that where a proposal is acceptable in land use terms, and consent is being granted, local authorities may wish to engage in negotiations to secure community benefit in line with the Scottish Government Good Practice Principles for Community Benefits from Onshore Renewable Energy Developments.

21. Turning to the consideration of representations, I have dealt with both those lodged in response to the council’s submissions on the FIRs, and those made to the proposed plan itself, to the extent that they remain relevant.

22. The current Scottish Planning Policy clearly sets out a new approach for preparing a spatial framework from that set out in the 2010 Scottish Planning Policy. A spatial framework prepared under the current Scottish Planning Policy does not have to include the range of matters required in a framework prepared under the earlier national policy. A spatial framework is now to be focussed on international and national designations, other nationally important mapped environmental interests and community separation. The process of preparing a spatial framework now appears less complex. Several of the matters that had previously to be included are now to be dealt with as considerations at the development management stage rather than through a spatial framework. Most notably, these include cumulative impact, areas designated for their regional and local landscape or natural heritage value, aviation and defence interests, scheduled monuments, and tourism and recreational interests.

23. In a spatial framework for Fife, there would be no group (1) areas ie areas where wind farms would not be acceptable. There would be group (2) areas, ie areas where significant protection would be required and, beyond groups (1) and (2), the remaining
area would all be group (3), ie an area with potential for wind farm development. The group (2) areas would include special areas of conservation, special protection areas, Ramsar sites, sites of special scientific interest, national nature reserves, sites in the inventory of gardens and designed landscapes, a site in the inventory of historic battlefields, carbon rich soils, and community separation areas (not exceeding 2km) around towns and villages identified in the proposed plan.

24. The proposed plan and the supplementary guidance should be changed to accommodate the requirements for a spatial framework set out in the current Scottish Planning Policy. Significant changes are also required to the policy and the relevant text in the proposed plan as a result of national policy. The spatial framework and the landscape capacity and cumulative thresholds map in the proposed plan (figures 11.1 and 11.2) together appear to identify very modest areas of search for wind energy. The areas identified in the new framework as likely to be acceptable for wind farms, subject to detailed considerations, will likely be significantly larger than the areas of search shown in the proposed plan. While I agree with the council that no provision is made in the new spatial framework for dealing with landscape capacity and cumulative impact, the current Scottish Planning Policy is clear that additional constraints like these should not be applied at this stage in the interests of consistency nationally.

25. The further spatial framework submitted by the council in response to FIR 58 seeks to better reflect the approach outlined in Scottish Planning Policy. While the revised spatial framework would ideally be included in the proposed plan, I am concerned about committing to this course of action because it still identifies only very modest areas of search. The council’s response to FIR 58b shows that this has occurred because a uniform 2 kilometre community separation distance has been been applied around settlements. I note that Scottish Planning Policy indicates that the extent of the community separation distance should be determined by the planning authority based on landform and other features which restrict views out from settlements, and the Scottish Government’s online responses to questions about onshore wind provide examples of the types of matters that might be taken into account in setting a distance.

26. In adopting a uniform community separation distance, rather than using a suitable methodology to establish an appropriate distance, I consider that the council’s further spatial framework is insufficiently specific to provide the necessary guidance to users of the proposed plan on how a proposal might be viewed by the council. I believe that an exercise to set appropriate community separation distances for settlements is necessary given the extent to which the separation distances dominate the council’s further spatial framework. I acknowledge that the council will have to consider how it approaches this task, that it is likely to be a major exercise potentially involving many settlements, and that it could take some time to prepare. However, I remain firmly of the view that further work (in line with the terms of Scottish Planning Policy) and public consultation on the spatial framework is required. The council’s proposal that the spatial framework should apply to turbines of 25 metres plus does not appear unreasonable, but further consideration requires to be given to the minimum number of turbines to which the framework would apply.

27. As the spatial framework (figure 11.1) set out in the proposed plan needs replacing by a new framework, it would be inappropriate to retain it in the proposed plan, and it should be deleted. It would also be inappropriate to insert the further spatial framework proposed by the council (in FIR 58) in the plan. In the circumstances, I consider that it would be reasonable for a new spatial framework to form a part of the supplementary
guidance proposed by the council. Under section 24 of the 1997 Town and Country Planning (Scotland) Act (as amended), the development plan, in which the current Scottish Planning Policy requires the framework to be set out, includes such guidance.

28. The landscape capacity and cumulative thresholds map in the proposed plan (figure 11.2) is based on information (particularly figure 6.4) contained in the 2012 strategic landscape study. It (and the spatial framework) are referred to in the section of Policy 11 dealing with landscape capacity for onshore wind turbines. I have no doubt that landscape capacity studies are relevant and supportive, and can help development management decisions. However, given the way the map is presented in the proposed plan, I am concerned that it is likely to be seen as an integral part of a spatial framework, and this is misleading. I also consider that it is inappropriate to extract the information from the context provided for it by the strategic landscape capacity study as a whole, without a fuller explanation of the study and its terms. As such, I believe that figure 11.2 should be deleted from the proposed plan, and the council acknowledges that this is a possibility in its response to FIR 58. I accept that the study should be mentioned in the plan, but it should be highlighted that it is identifying potential landscape capacity because, by its very nature, the study is a general, broad scale analysis, focussing on landscape character units, and is not site specific.

29. Some representations referred to the content of the strategic landscape capacity study, but the document itself is not before the examination, and it can only be dealt with here to the extent that it is referred to in the proposed plan.

30. In addition to a new spatial framework and the deletion of the landscape capacity and cumulative thresholds map, changes are required to the wording of policy 11. There are 2 relevant sections in the policy – low carbon energy schemes and landscape capacity for onshore wind turbines. These sections require to be changed to cover the preparation of statutory supplementary guidance on wind energy and other low carbon energy schemes. The changes also require to cover the need for the supplementary guidance to include detailed policy considerations, and a more appropriate spatial framework for wind energy. Bearing in mind the amount of work that may be involved, I believe that the supplementary guidance should take no more than 12 months to prepare from the date of the adoption of the proposed plan.

31. In the first paragraph of the low carbon energy schemes section of Policy 11, I am satisfied with the inclusion of the words an unacceptable impact, because the planning authority, as decision maker, will be assessing the acceptability of a proposal when considering whether or not to support it. However, I accept that a tangible criterion indicating the level of acceptability would be helpful. While I accept that the words significant detrimental impact are used in Policy 10, which seeks to protect amenity, I prefer the words significant adverse effects or impacts because this better reflects the terminology used in assessing proposals where environmental impact assessments are required. I therefore believe that the words an unacceptable impact should be changed to unacceptable significant adverse effects or impacts. I also consider that it would be appropriate to take into account in the policy, the potential for satisfactorily mitigating such effects or impacts. I am not persuaded that this paragraph would be greatly improved and made more useful by structuring it to refer to the positive contributions arising from development through, for example, good design, scale, and siting.

32. The current Scottish Planning Policy makes clear that in achieving an area’s full potential for electricity and heat from renewable sources, due regard should be given to
relevant environmental, community, and cumulative impact considerations. I believe that it would be useful to reflect the new national policy by referring to these 3 considerations in this paragraph of the policy immediately after the words unacceptable significant adverse effects, all as set out below. In light of the recommended changes to this paragraph, I believe that the references to individually, cumulatively, Fife’s landscapes, natural environment, towns, villages, and sensitive environmental receptors are unnecessary.

33. I believe that the second paragraph of the low carbon energy schemes section of Policy 11 should be expanded to indicate that applications will be assessed against the principles of the current Scottish Planning Policy. This would ensure that proposals are assessed in the manner intended by the latest national policy. I note that some representations seek to expand the list of matters in this paragraph, on which proposals should have an acceptable impact. The current Scottish Planning Policy explains that proposals should always take account of spatial frameworks for wind farms (and heat maps), and lists a number of considerations for energy infrastructure developments (paragraph 169). These considerations are the most up to date available at this time. Rather than just expand the list in the way proposed in the representations, I consider that it would be more appropriate to use the considerations listed in the current Scottish Planning Policy, suitably adjusted. They form a reasonable and helpful basis for assessing renewable energy proposals, they are a relatively comprehensive list, including net economic impact and contribution to renewable energy targets, and they cover the matters referred to in Policy 11 and many of those mentioned in representations, including all cumulative impacts. I note that some relevant considerations are referred to in representations but are not covered by Scottish Planning Policy, for example, forestry, woodland, and hazardous pipelines. I am satisfied that they can reasonably be added to the list of considerations. However some, such as habitats and wildlife, are reasonably covered by those recommended and, bearing in mind that the list is not exhaustive, others such as ground stability over old underground works are unnecessary. The appropriate test to be applied to the considerations when assessing proposals is that set out in the first paragraph of this part of the recommended policy. A reference should be inserted here to the supplementary guidance for low carbon energy schemes.

34. In light of the above conclusions, including those on the spatial framework and the landscape capacity and cumulative thresholds map, I consider that the Landscape Capacity for Onshore Wind Turbines section of the policy requires to be changed by deleting the references to the spatial framework and the landscape capacity and cumulative thresholds map. Instead, it should refer to the need for a revised spatial framework, and set out the approach to assessing the landscape and visual impacts of wind energy applications, including the strategic landscape capacity and cumulative impact study. It should highlight that assessments of wind energy applications will take into account the spatial framework. It is also reasonable to highlight that, in landscape and visual impact assessments, the strategic landscape capacity and cumulative impact study is an initial reference point because it is just one of the elements to be used in assessing proposals. Others include the landscape and visual impact assessment for a proposal and relevant landscape, visual and cumulative impact guidance, for example that produced by Scottish Natural Heritage. I am satisfied that the test recommended in the low carbon energy schemes section of the policy, along with the recommended considerations, and other policies in the proposed plan provide reasonable principles and guidance for assessing wind energy proposals, and can be developed more fully in supplementary guidance. With the changes proposed, the heading of this section of the
policy should be altered to onshore wind energy.

35. The text in the Applying Policy 11 section of the proposed plan requires changes to reflect those made to Policy 11, and to better accommodate an approach based on the principles of the current Scottish Planning Policy. In particular, it should appropriately link the receptors referred to in the supporting text of the proposed plan to the policy considerations mentioned in the recommended policy. The sub-heading sensitive receptors serves little purpose, and should be replaced by the word considerations, which is what, in essence, the following paragraphs (as recommended) set out. The Customer Guidelines: Renewable Energy in Fife appear to be out of date, and reference to them should be deleted. The revised text also requires to recognise the need for supplementary guidance on low carbon energy schemes, including wind energy. Furthermore, it requires to set out the method for preparing a spatial framework for onshore wind farms, the approach to be taken to the landscape capacity and cumulative impact report, bearing in mind that landscape and visual impacts should now be assessed as part of a more detailed and exacting development management process.

36. I agree that consideration has to be given to identifying whether there is strategic capacity for wind farms in the plan area. I believe that the preparation of a spatial framework is likely to assist in this exercise. However, in the absence of an acceptable spatial framework, and given the uncertainty over whether such strategic capacity exists, I consider that it would be best if the proposed plan identified a need to undertake work on this matter. I am satisfied that this can reasonably be covered in the supporting text, and that it is unnecessary to refer to it in Policy 11 itself. Any area identified as having strategic capacity can be brought forward and identified on the spatial strategy map in the next local development plan.

37. Part of the supporting text covers the development of solar farms. I can find no basis for protecting prime agricultural land from such development on the grounds of visual impact. Taking this into account, while bearing in mind the need to ensure that an area’s full potential for electricity is achieved, I consider that this part of the supporting text is best changed by highlighting only the importance of visual impact as a general consideration, and the more suitable locations for such development.

38. Consequential changes are required to other parts of the proposed plan. Policy 1: Development Principles requires to be changed to take account of the requirement in the current Scottish Planning Policy to develop an area’s full potential for electricity and heat from renewable sources, in line with national climate change targets, giving due regard to relevant environmental, community and cumulative impact considerations. This should be added as an additional criterion to Part B of the policy. The reference in Part B7 to Policy 11 can be deleted because landscape issues are reasonably covered, along with other issues, in the new criterion. The Strategy for Low Carbon and Energy also requires to be changed to take account of the recommendation to delete the framework from the proposed plan, and to better reflect the changed approach recommended to Policy 11 and the supporting text.

39. Many of the other changes proposed in representations set out in the 2 schedule 4s, which relate to the wording of Policy 11 and its supporting text, have been overtaken by the assessment of the approach to low carbon energy schemes in the proposed plan against the current Scottish Planning Policy. They raise no matters requiring further changes to the recommended policy and text.
40. It is unrealistic to expect the proposed plan to put forward a spatial framework that is contrary to the approach in the current Scottish Planning Policy. It would therefore be inappropriate for me to recommend that a community separation distance, applied under group (2) areas of the spatial framework, should be extended to cover not only towns and villages but hamlets and groups of 10 and more houses. Even if the community separation distance was extended in the manner proposed in the representations, I note that, under the current Scottish Planning Policy, a wind farm may still be considered appropriate in this area in some circumstances. I am not persuaded that, without the proposed further restriction, there would be a “free for all” because the impacts of any proposal, including the impacts on communities and individual dwellings, would require to be assessed during the development management process, which is now to be more detailed and exacting.

41. I am not satisfied that it is necessary to provide a separate map in the proposed plan showing the local landscape areas because the proposals map already contains this information. Taking into account the changes recommended to Policy 11, I can see no basis for concluding that it would undermine the Forestry Commission’s aim of delivering the Scottish Forestry Strategy, and its other strategic plans, all of which support the development of appropriate renewable energy schemes on the national forest estate as part of its responsible management of this resource. I consider that Policy 11, as recommended, reasonably seeks to achieve development which allows for mitigation of, and adaptation to, climate change, including taking into account the potential effects of low carbon energy schemes on woodland and forestry.

42. I do not consider that it is necessary to refer in Policy 11 to matters of detail, such as the guidance of the UK Onshore Pipeline Operator’s Association. I believe that the proposed plan need go no further than the recommendation to refer to the impacts on hazardous installations (including pipelines). I do not consider that it is necessary to refer to specific sites or areas, such as Fife’s Energy Park or Rosyth port and its immediate hinterland, in Policy 11 which is a general policy, whose purpose is to set out criteria for assessing development proposals. I also note that the importance of these 2 locations is recognised elsewhere in the proposed plan, including the section dealing with Fife’s Spatial Strategy. Taking these references, together with the reference to Fife’s Energy Corridor and the general support in Policy 11 for low carbon energy schemes, I am satisfied that the proposed plan implicitly recognises the importance of offshore wind development to the local economy, and that no further changes are required.

**District Heating**

43. The section of the policy on district heating emphasises the importance of the Fife Heat Map in assessing applications that create a heat demand or waste heat. It also indicates that energy centres may be required where appropriate, and that new development will require to include infrastructure for connection to the network.

44. No heat map is included in the proposed plan. The council explains that the map is online, complex and comprises layers, and that the website is continuously updated to make it more accurate. In my view, these difficulties would apply whether the map was included in the proposed plan or supplementary guidance. I note that Scottish Planning Policy does not require local development plans to set out a heat map. Instead, it requires plans to use heat mapping to identify the potential for co-locating developments with a high heat demand with sources of heat supply. Taking the difficulties associated
with incorporating it into the proposed plan or supplementary guidance, together with the terms of Scottish Planning Policy, I consider that it would be best if, for the time being, the Fife Heat Map remained as a reference in the proposed plan. This would not be inconsistent with either SESplan or TAYplan, which both go no further than generally recognising the importance of developing heat networks. While this may affect the weight that can be given to the map in the determination of planning applications, it would be a material consideration.

45. In response to FIR 58b, the council indicates that supplementary guidance is to be prepared and will provide additional information and detail on heat networks to support Policy 11. I consider that such additional guidance could be helpful to users of the plan, could explain the approach taken to on line heat mapping, and could go some way to addressing the representations on this matter. In the circumstances, I believe that it would be appropriate to change this part of Policy 11 and its supporting text to refer to a requirement to prepare supplementary guidance. Such guidance should be prepared as soon as possible after the date of the adoption of the plan.

Other matters

46. Air Quality is dealt with at Policy 10: Amenity in the proposed plan, and at Issue 2c (Planning Obligations, Infrastructure, & Amenity) in this report. In response to FIR 58b, the council indicates that supplementary guidance is to be prepared to provide additional information and detail on air quality assessments. I consider that such additional guidance could be helpful to users of the plan, could usefully explain how proposals could demonstrate that they would not lead to an adverse impact on air quality, and would take into account the terms of the representation on this matter. In the circumstances, I believe that it would be appropriate to change the part of Policy 10 relating to air quality, and its supporting text, to refer to the preparation of supplementary guidance. Such guidance should be prepared as soon as possible after the date of the adoption of the plan.

47. Overall, adjustments are required to the proposed plan, as set out below.

48. See also Issue 2c where further changes are recommended to Policy 10 and its supporting text.

Reporter’s recommendations:

I recommend that the following modifications be made:

1. In Policy 11: Low Carbon Fife, page 231, adjust criterion 1 of the Sustainable Buildings part of the policy so that it reads:

   “1. the proposal meets the current carbon dioxide emissions reduction target (as set out by Scottish Building Standards), and that low and zero carbon generating technologies will contribute at least 15% of these savings from 2016 and at least 20% from 2020. Statutory supplementary guidance will provide additional advice on compliance with this requirement;...”
2. In the Applying Policy 11 section, paragraph 1, page 232 adjust the text so that the paragraph reads:

   “1. The Council has an obligation under section 3F of the Town and Country Planning (Scotland) Act 1997 to:

   ‘…include policies requiring all developments in the local development plan area to be designed so as to ensure that all new buildings avoid a specified and rising proportion of the projected greenhouse gas emissions from their use, calculated on the basis of the approved design and plans for the specific development, through the installation and operation of low and zero-carbon generating technologies.’

   Policy 11 will be applied to discharge that obligation and meet the criteria. Proposals for new development must accord with the current carbon dioxide emissions reduction target (as set out by Scottish Building Standards) and demonstrate that low and zero carbon generating technologies will contribute towards at least 15% of these savings from 2016 and at least 20% from 2020. Supplementary Guidance will provide additional information on how to demonstrate compliance with this requirement. The Buildings Standards targets are expected to rise during this Plan period.”

3. In Policy 11: Low Carbon Fife, page 231, adjust criterion 4 of the Sustainable Buildings part of the policy so that it reads:

   “4. sustainable urban drainage measures will ensure that there will be no increase in the rate of surface water run off in peak conditions or detrimental impact on the ecological quality of the water environment;…”

4. In Policy 11: Low Carbon Fife, page 231, adjust the last sentence of the Sustainable Buildings part of the policy so that it reads:

   “All development should encourage and facilitate the use of sustainable transport appropriate to the development, promoting in the following order of priority: walking, cycling, public transport, cars.”

5. In Policy 11: Low Carbon Fife, page 231, adjust the Low Carbon Energy Schemes part of the policy so that it reads:

   “Development of low carbon energy schemes such as wind turbines, district heating, solar arrays, or energy from waste will be supported provided the proposals do not result in unacceptable significant adverse effects or impacts which cannot be satisfactorily mitigated, giving due regard to relevant environmental, community and cumulative impact considerations.

   The assessment of proposals for renewable energy developments will be based on the principles set out in the current Scottish Planning Policy, in particular, for onshore wind developments, the requirements for spatial frameworks (as set out in Table 1). Assessments will include the following considerations:
   - landscape and visual impacts, including landscape character;
   - all cumulative impacts, including cumulative landscape and visual impact, recognising that in some areas the cumulative impact of existing and consented development may limit the capacity for further development;
- impacts on communities and individual dwellings (including visual impact, residential amenity, noise and shadow flicker);
- impacts on aviation and defence interests, public access, the historic environment (including scheduled monuments and listed buildings, and their settings), tourism and recreation, telecommunications and broadcasting installations, forestry and woodland, adjacent trunk roads and road traffic, hazardous installations (including pipelines), and carbon rich soils (using the carbon calculator);
- effects on the natural heritage (including birds), and hydrology, the water environment and flood risk;
- opportunities for energy storage;
- net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities;
- the scale of contribution to renewable energy generation targets, and the effect on greenhouse emissions;
- the need for conditions relating to the decommissioning of developments, including ancillary infrastructure, and site restoration; and
- the need for a robust planning obligation to ensure that operators achieve site restoration.

The council will produce statutory supplementary guidance on low carbon energy schemes, including wind energy. This shall be submitted to Ministers within 12 months of the date of the adoption of the plan. The guidance will accord with the current Scottish Planning Policy, and will set out the detailed policy considerations against which all proposals for low carbon energy schemes, including wind energy, will be assessed, based on those considerations set out above."

6. In Policy 11: Low Carbon Fife, page 231, adjust the Landscape Capacity for Onshore Wind Turbines part of the policy so that it reads:

   “Onshore Wind Energy

   The statutory supplementary guidance relating to wind energy will contain the onshore spatial framework as required by the current Scottish Planning Policy, identifying areas of significant protection and areas with potential for wind farm development, and indicating the minimum scale of onshore wind development that the framework applies to.

   The assessment of wind energy applications will take into account the onshore spatial framework, which identifies those areas that are likely to be most appropriate for onshore wind farms. In assessing the landscape and visual impacts of wind energy applications, account will be taken of the Final Report on the Onshore Wind Energy Strategy for Fife, Cumulative Impact Assessment (November 2012) as an initial reference point, the landscape and visual impact assessment for a proposal (which should demonstrate that it can be satisfactorily accommodated in the landscape, and should properly address the issues in the 2012 report), and other relevant landscape, visual and cumulative impact guidance, for example that produced by Scottish Natural Heritage.”

7. In Policy 11: Low Carbon Fife, page 231, adjust the District heating part of the policy so that it reads:

   “All applications that create a heat demand or waste heat will be assessed against
the Fife Heat Map. Developers may be required to provide energy centres within new development in areas identified as appropriate for district heating, or where a district network exists or is planned. New development in these areas will include infrastructure for connection to the district network. Statutory supplementary guidance will provide additional information, detail and guidance on heat networks, including an explanation of the approach taken to on line heat mapping.”

8. In the Applying Policy 11 section, paragraph 4, page 232 adjust the text so that the paragraph reads:

“There will be a presumption to support the development of energy and heat infrastructure in Fife in appropriate locations where it does not result in unacceptable significant adverse effects or impacts which cannot be satisfactorily mitigated, giving due regard to relevant environmental, community and cumulative impact considerations.”

9. In the Applying Policy 11 section, paragraphs 5 to 7, page 232, adjust the text (to include the deletion of the list of sensitive receptors) so that the paragraphs read:

“Considerations

5. Renewable energy technologies will be assessed against a range of considerations, with their benefits being balanced against a range of potential negative impacts and effects. Supplementary guidance on low carbon energy schemes, including wind energy, will be prepared. It will set out the detailed policy considerations against which all proposals for low carbon energy schemes, including wind energy, will be assessed, based on the considerations set out in Policy 11.

6. The key to the success of an application will be to seek to minimise its impacts and effects on receptors. Important sensitive receptors include nationally and internationally designated sites, such as Natura 2000 sites, Ramsar sites and sites of special scientific interest, communities and individual dwellings, major transport routes and walking and cycling routes, defence and aviation interests, scheduled monuments, listed buildings and conservation areas, tourist attractions and key viewpoints. There are others, and the matters that have to be addressed in any particular case will be agreed with the council through the pre-application process.

7. The council expects most energy developments to be subject to appropriate environmental impact screening and scoping before submission of a planning application. In most cases, detailed supporting information will be needed to examine impacts and effects and how these can be limited.”

10. In the Applying Policy 11 section, delete paragraphs 8 to 9, page 232, and insert the following text to read:

“8. A spatial framework for onshore wind farms helps to guide development to appropriate locations, taking into account important features. The requirements for a spatial framework are contained in the current Scottish Planning Policy. The council’s spatial framework (strategy) for onshore wind farms does not comply with the policy. The approach to the preparation of a spatial framework is based on 3 groups – (1) areas where wind farms will not be acceptable, (2) areas of significant
protection where wind farms may be appropriate in some circumstances, and (3) areas beyond groups (1) and (2) where wind farms are likely to be acceptable, subject to detailed consideration against identified policy criteria. The areas where cumulative impact limits further development and landscape capacity considerations are not included in a spatial framework, but national and international designations (eg Natura 2000 and Ramsar sites, and Sites of Special Scientific Interest), and community separation distances for settlements are all group (2) areas. There are no group (1) areas in Fife. A spatial framework requires to indicate the minimum scale of onshore wind development that it applies to.

9. The current Scottish Planning Policy indicates that the spatial framework is to be complemented by a more detailed and exacting development management process where the merits of an individual proposal will be carefully considered against the full range of environmental, community, and cumulative impacts. The context set by the November 2012 report on Landscape Capacity and Cumulative Impact, the landscape and visual impact assessment for a proposal, and other relevant landscape, visual and cumulative impact guidance, for example that produced by Scottish Natural Heritage, will be taken into account at this stage.

10. The supplementary guidance relating to wind energy will contain the onshore spatial framework, and detailed guidance for development proposals, taking into account, and properly reflecting, the current Scottish Planning Policy. In defining the extent of community separation distances for inclusion in the spatial framework, the council will take into account landform and other features which restrict views out from the settlement in line with Scottish Planning Policy.

11. The council will consider, together with the strategic planning authorities, whether there is strategic capacity for wind farms in any part of the plan area. Any area identified as having such capacity will be included in the next local development plan.”

11. In the Applying Policy 11 section, paragraph 12, page 233 adjust the text so that the paragraph reads:

“12. The need for an energy centre will depend on the scale of heat demand. Supplementary Guidance will provide additional information, detail and guidance on heat networks, including an explanation of the approach taken to on line heat mapping.”

12. In the Applying Policy 11 section, paragraph 13, page 233 adjust the text so that the paragraph reads:

“13. Solar arrays – or solar farms – are becoming more familiar across the country. This policy will apply to proposals for new schemes. Visual impact will be an important consideration in assessing these schemes. Rural brownfield land, and land outwith green belts, Local Landscape Areas and environmentally sensitive areas are more likely to be suitable locations for such schemes.”

13. In the Applying Policy 11 section, pages 234 and 235 delete figures 11.1 and 11.2 (ie Spatial Framework for Wind Turbines [figure 11.1], and Landscape Capacity and Cumulative Thresholds for Wind Turbines [figure 11.2]).
14. In the Low Carbon and Energy section, paragraph 23, page 13, adjust the text so that the paragraph reads:

   “23. Several wind farms and turbines are already in operation in Fife, and these will be added to by several other consented wind turbines and wind farms during this plan period. The policy approach to onshore wind energy takes account of the need to prepare a new spatial framework which is in line with national policy. Work has also been undertaken on potential landscape capacity for wind energy development because of possible adverse and cumulative effects. While wind energy will be supported in principle as an important element of providing a mix of renewable energy, the assessment of proposals will take into account a range of impacts, including landscape, communities, aviation and defence interests, the natural heritage, and the historic environment.”

15. In Policy 1: Development Principles, page 191, adjust Part B of the policy by adding an additional criterion to read:

   “12. contribute to achieving the area’s full potential for electricity and heat from renewable sources, in line with national climate change targets, giving due regard to relevant environmental, community and cumulative impact considerations (see Policy 11 Low Carbon Fife).”


17. In Policy 10: Amenity, page 229, adjust the Air Quality part of the policy so that it reads:

   “Air Quality

   Development proposals that lead to a breach of National Air Quality Standards or a significant increase in concentrations of air pollution within an existing Air Quality Management Area (AQMA) will not be supported.

   Statutory supplementary guidance will provide additional information, detail and guidance on air quality assessments, including an explanation of how proposals could demonstrate that they would not lead to an adverse impact on air quality.”

18. In the Applying Policy 10 section, paragraph 7, page 230, adjust the text so that the paragraph reads:

   “7. An air quality assessment may be required for developments that are within AQMAs or where the proposed development may cause or significantly contribute towards a breach in air quality management standards. Development proposals that lead to a breach of National Air Quality Standards or a significant increase in concentrations within an existing AQMA will not be supported. Supplementary guidance will provide additional information, detail and guidance on air quality assessments, including an explanation of how proposals could demonstrate that they would not lead to an adverse impact on air quality.”
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<tr>
<th>Issue 2h</th>
<th>The Environment &amp; Flooding</th>
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<tbody>
<tr>
<td>Development plan reference:</td>
<td>Heritage (paragraph 25 page 13); Quality of Place (paragraphs 31 - 33, page 14); Policy 12: Flooding and the Water Environment (pages 237 – 239); Policy 13: Natural Environment and Access (pages 241 - 242); Policy 14: Built and Historic Environment (pages 243 – 245)</td>
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<td>Reporter:</td>
<td>Robert Maslin</td>
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<th>Body or person(s) submitting a representation raising the issue (including reference number):</th>
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<tr>
<td>Heritage</td>
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<tr>
<td>Bruce Logan (875)</td>
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<td>Scottish Natural Heritage (908)</td>
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<td>Quality of Place</td>
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<td>Gladman Developments Ltd (2766)</td>
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<td>Jacobs (1190)</td>
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<td>Royal Yachting Association (1788)</td>
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<td>RSPB Scotland (2823)</td>
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<td>The Woodland Trust Scotland (2842, 2853)</td>
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<td>Scottish Government (3214)</td>
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<td>SEPA (3293)</td>
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<td>Policy 14: Built and Historic Environment</td>
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<td>SEStran (711)</td>
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<td>Scottish Natural Heritage (921)</td>
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<td>Jacobs (1192)</td>
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<td>Stirling Developments (2042)</td>
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<td>Historic Scotland (3921)</td>
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<th>Provision of the development plan to which the issue relates:</th>
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<th>Planning authority’s summary of the representation(s):</th>
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<tr>
<td>Heritage</td>
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<tr>
<td>Scottish Natural Heritage (908): Object to the title ‘Heritage’ used for this section. Paragraph 25 creates a distinction between nature and culture and heritage. Suggest the first line of paragraph 25 should start ‘Fife’s rich natural and cultural heritage assets…’ Welcome the clear statement on preserving the local character of settlements and landscapes and avoiding loss and degradation of natural resources as a fundamental principle of the Plan.</td>
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<tr>
<td>Bruce Logan (875): Paragraph 25 should include text on the benefits to business and tourism of heritage it should not just focus on protection.</td>
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Quality of Place

Scottish Natural Heritage (897): Agree that the plan ‘marks a step change towards a more sustainable Fife where new development is of a high quality’ this aspiration is clearly demonstrated through the rest of the plan and its supporting documents.

Gladman Developments Ltd (2766): Support the aim that Fife is a sustainable place where development is of a high quality, however there needs to be a balance between deliverability and adding value to development. Demonstrating that development meets the six qualities of successful places will be subjective and open to interpretation, implementation should be flexible and appropriate to the context of a development.

The William Brown Trust (3888): Support the emphasis on improved design and creation of successful places; this is in line with national policy.

Policy 12: Flooding and the Water Environment

Scottish Natural Heritage (919): Policy 12 makes clear the relationship between the water environment and designated sites is clear and welcome the caveats included in the settlement plans.

Scottish Environment Protection Agency (3292): Support policy 12 in respect of flooding. It provides a comprehensive framework for decision making that promotes a precautionary approach to managing flood risk through avoidance as the most sustainable option. However would recommend the following changes to strengthen the policy intention:

1. Add the following bullet point to the list on page 237
   • Conform to the principles of Scottish Planning Policy.

2. Page 238 Paragraph 2 should be amended to clarify that civil infrastructure including hospitals, schools and fire stations should be outwith the 1:1000 year risk of flooding in accordance with the flood risk framework in Scottish Planning Policy.

3. Page 238 Paragraph 3 amend this sentence to read ‘to use resilient and resistant construction’.

4. Page 238 paragraph 5 welcome the reference to Scottish Environment Protection Agency vulnerability guidance but advise against the picking and choosing of ‘most vulnerable uses’ in paragraph 2 as more than just caravans are included in that table. The reference to ‘most vulnerable use, new caravan and camping sites’ within paragraph 2 is removed.

5. Page 238 paragraph 7 recommend the third sentence is amended to read, “Redundant water engineering installations should be removed provided that no increase in risk elsewhere has been demonstrated”.

Support the policy in respect of impacts on the water environment as it commits all development to minimise and mitigate impacts on the water environment and accord with the protection and improvement objectives of the Water Framework Directive. However would recommend the following changes to strengthen the policy intention:

1. In order to ensure consistency with the Water Framework Directive, it is important that the Proposed Plan includes reference to the ecological quality of the water environment. Recommend that point 3 on page 237 is amended to read ‘Detrimentally impact on the ecological quality and water environment including its natural
characteristics, river engineering works, or recreational use;’
2. Page 238 paragraph 9 welcome the reference to the Water Framework. To ensure consistency with the Water Framework Directive, it is important that the Proposed Plan includes reference to the ecological quality of the water environment. ‘Ecological quality’ takes into account specific aspects of the biological quality elements of the water environment, not just whether it is polluted or not.

**Policy 13: Natural Environment and Access**

Scottish Natural Heritage (920): Support policy 13 and the caveats for designated sites are clear and concise and meet the requirements of the Habitats Regulations. The integration of green networks and access is welcome.

Jacobs (1190), RSPB Scotland (2823): The text ‘Where adverse impacts on existing assets are unavoidable we will only support proposals where these impacts will be satisfactorily mitigated’ should be amended to reflect Scottish Planning Policy paragraph 204.

Jacobs (1190): Scottish Government’s Policy on Control of Woodland Removal (Annex C) recognises that renewable energy development involving woodland removal is potentially an acceptable form of development. Policy 13 and its ‘Applying the policy’ text should specifically refer to Annex C and the acceptability in principle of renewable energy projects.

Supplementary Guidance should be referred to and provided for ‘Carbon rich soils (including peat).’

RSPB Scotland (2823): Welcome the inclusion of green networks and the provision of further detail in Supplementary Guidance.

The Woodland Trust Scotland (2842, 2853): Any woodland included in Scottish Natural Heritage’s Ancient Woodland Inventory, present on historical maps or which exhibits a significant number of ancient woodland indicators can be considered as ancient and should be protected for its conservation value.

Comment on the potential impact of development on woodland. Development mitigation should seek to enhance the ability of woodland species to move between ancient woods by creating habitat corridors.

Creation of new areas of woodland or buffer zones help to reduce and ameliorate the impact of damaging ‘edge effects’, serving to improve their sustainability. The size of the buffer is dependent on the intensity of land use. A buffer zone of at least 50 metres of semi-natural vegetation would be required to protect the woodland from the change in land use on the site.

Scottish Government (3214): Generally support policy 13; however the text ‘Where adverse impacts on existing assets are unavoidable we will only support proposals where these impacts will be satisfactorily mitigated’ does not fully align with paragraph 212 of Scottish Planning Policy, regarding development that affects Sites of Special Scientific Interest and National Nature Reserves, which would imply stronger protection of these designated sites.
**SEPA (3293):** Support the inclusion of carbon rich soils (including peat) in Policy 13 and the text that where adverse impacts on existing assets are unavoidable Fife Council will only support proposals where these impacts can be satisfactorily mitigated. Welcome paragraphs 1 & 2 in the supporting text in particular the wording - ‘would constitute appropriate mitigation measures will be considered on a site by site basis…….any detailed assessments or studies required must be undertaken by a suitably qualifies professional’. Such measures can be seen as a climate change mitigation measure and in keeping with the Council’s duties under the Climate Change (Scotland) Act 2009.

Royal Yachting Association (1788): Policy 10* should reference impacts on water-based coastal recreation; these can be vulnerable to developments that threaten existing access to the water and boat storage areas.

(*Fife Council note: this comment relates to access which is covered under Policy 13 rather than Policy 10.)

**Policy 14: Built and Historic Environment**

SEStran (711): Policy 14 is welcomed in Transport terms in particular points 4 & 6 and the Supplementary guidance referred to should highlight the importance of ease of pedestrian and cycle access from new development to local facilities and public transport nodes.

Scottish Natural Heritage (921): The policy commitment to creating successful places is welcome and we are particularly pleased to see the inclusion of green networks in this policy’s explanatory text. We welcome the early discussion and input we have had to the forthcoming Supplementary Guidance.

Jacobs (1192): The text at bullet point one under ‘archaeological sites and deposits’ does not mirror Scottish Planning Policy (paragraph 151) and should change to be consistent.

Policy 14 does not refer to enabling development - Scottish Planning Policy Paragraph 142 sets out that: ‘Enabling development may be acceptable where it can clearly be shown to be the only means of preventing the loss of the asset and securing its long term future.’ Policy 14 should recognise the benefits associated with enabling development.

Stirling Developments (2042): We support the Council in its drive to secure quality development by applying the six qualities of successful places when considering development proposals.

Historic Scotland (3921): Where advice on historic battlefields has been identified through the site assessment process this should have been included in the development requirements for these sites.

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<tr>
<td><strong>Heritage</strong></td>
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<td>Scottish Natural Heritage (908): The title of paragraph 25 should be revised to better reflect the content in the paragraph. The first sentence should be revised to start ‘Fife’s</td>
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rich natural and cultural heritage assets…’

Bruce Logan (875): Include text on the benefits to business and tourism of heritage in Paragraph 25.

Quality of Place

No modifications have been sought.

Policy 12: Flooding and the Water

Scottish Environment Protection Agency (3292): Make the following amendments to the policy and applying the policy text:
1. Amend point 3 on page 237 to read ‘Detrimentally impact on the ecological quality and water environment including its natural characteristics, river engineering works, or recreational use;’
2. Add the following bullet point to the list on page 237
   • Conform to the principles of Scottish Planning Policy.
3. Amend paragraph 2, page 238 to clarify that civil infrastructure including hospitals, schools and fire stations should be outwith the 1:1000 in accordance with the flood risk framework in Scottish Planning Policy and delete the reference to ‘most vulnerable use, new caravan and camping sites’.
4. Amend paragraph 3, page 238 to read ‘to use resilient and resistant construction’.
5. Amend the third sentence of paragraph 7, page 238 to read, ‘Redundant water engineering installations should be removed provided that no increase in risk elsewhere has been demonstrated’.
Include references to the ecological quality of the water environment in FIFEplan.

Policy 13: Natural Environment and Access

Jacobs (1190), RSPB Scotland (2823): The text under the nine listed criteria should change to state: ‘Where significant irreversible damage on existing assets could occur, modifications to the proposal to eliminate the risk of such damage will be considered. If there is uncertainty, the potential for research, surveys or assessments to remove or reduce uncertainty will be considered.’

Jacobs (1190): Under bullet point three (‘ Woodlands’ ) the text should change to the following: ‘Woodland (including native and other long established woods) in compliance with the Scottish Government’s Control of Woodland Removal Policy, and trees and hedgerows that have a landscape, amenity, or nature conservation value.’

The Woodland Trust Scotland (2842, 2853): Protect all woodland that could be considered as ancient. Development mitigation should seek to enhance the ability of woodland species to move between ancient woods by creating habitat corridors.

Scottish Government (3214): Additional text is required on the protection of Sites of Special Scientific Interest and National Nature Reserves, in accordance with paragraph 212 of the Scottish Planning Policy.

### Policy 14: Built and Historic Environment

Jacobs (1192): Bullet point one under the section on ‘All archaeological sites and deposits.’ Should change to: ‘Remains are preserved in-situ wherever feasible.’

Policy 14 should include an addition section specifically on enabling development and in line with Scottish Planning Policy it should state: ‘Enabling development will be supported where it can clearly be shown to be the only means of preventing the loss of the asset and securing its long term future.’

Historic Scotland (3921): Advice on historic battlefields should be included in the development requirements for affected proposals.

### Summary of responses (including reasons) by planning authority:

Where possible Fife Council has proposed changes to Policies 12, 13 and 14 to reflect Scottish Planning Policy 2014. The changes proposed relate to fairly minor changes to the text rather than more fundamental changes to the policy approach that would have been required to address issues such as housing land. The references to Scottish Planning Policy in this schedule 4 all relate to Scottish Planning Policy 2014.

#### Heritage

Fife Council agrees that the title above paragraph 25 does not fully reflect the content of the paragraph, and that the first sentence of this paragraph appears to separate nature and culture from heritage. It would also be appropriate to include some text on the benefits of heritage assets to business and tourism within paragraph 25 as suggested by Bruce Logan (875).

Fife Council considers there would be merit in making the following amendments and invites the Reporter to make an appropriate recommendation on this matter:

- Revise the title of paragraph 25 to read ‘Natural, Built and Cultural Heritage’;
- Revising the first sentence of paragraph 25 either in line with the wording provided by Scottish Natural Heritage (908) or to read ‘Fife’s rich natural, built and cultural heritage assets’;
- Add the following text after ‘assets’ in the first sentence of paragraph 25: ‘…attract tourism to the area and encourage investment, and… (are protected by policies in the Plan).’

#### Quality of Place

The six qualities of successful places have been referred to by Scottish Government since 2001. Fife Council’s *Making Fife’s Places Supplementary Guidance – Consultation Draft* seeks to clarify what Fife Council means by the six qualities and how it will evaluate whether or not a development meets them (see CD51 Making Fife’s Places proposed Supplementary Guidance – Consultation Draft pages 20-38). The evaluation framework is intended to be flexible and easily tailored to the type of development being assessed. It is therefore considered appropriate to use these terms in FIFEplan.
Policy 12: Flooding and the Water

The recommendation by Scottish Environment Protection Agency (3292) to add a reference to Flood Risk Assessments conforming to the principles of Scottish Planning Policy is considered to be too general and an unnecessary duplication of national policy. However, Fife Council considers that there is merit in the following amendments and invites the Reporter to make an appropriate recommendation on this matter:

- Add an additional bullet point: ‘Consider the flood risk framework set out in Scottish Planning Policy’, to the list on page 237 (see CD1 pages 58-59, paragraph 263).
- Clarification in paragraph 2 page 238 that civil infrastructure should be outwith the 1:1000 year flood risk to accord with the flood risk framework in Scottish Planning Policy (see CD1 page 58), and removal of the specific reference to the most vulnerable uses, new caravan and camping sites.
- Amend paragraph 3 page 238 to read ‘to use resilient and resistant construction.’ This would reflect the references in Scottish Planning Policy to water-resistant materials (see CD1 page 59) and the references to flood resistance and resilient materials in PAN69: Planning and Building Standards Advice on Flooding (see SD 1 paragraph 85 page 22).
- Amend the third sentence of paragraph 7 page 238 to read ‘Redundant water engineering installations should be removed provided that no increase in risk elsewhere has been demonstrated’.
- Include references to ecological quality of the water environment in point 3 on page 237, and paragraph 9 on page 238. The reference could also be included in paragraph 10 page 238.

Policy 13: Natural Environment and Access

Policy 13 states that

‘Where adverse impacts on existing assets are unavoidable we will only support proposals where these impacts will be satisfactorily mitigated.’

Whilst Scottish Planning Policy paragraph 212 states that

‘Development that affects a National Park, National Scenic Area, Site of Special Scientific Interest or a National Nature Reserve should only be permitted where:
- the objectives of designation and the overall integrity of the area will not be compromised; or
- any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.’ (see CD1 page 48)

Policy 13 does not support proposals where there are adverse effects that cannot be satisfactorily mitigated, whilst Scottish Planning Policy paragraph 212 accepts that significant adverse effects of a proposal can be outweighed by social, environmental or economic benefits of national importance. This would imply that policy 13 provides stronger protection than Scottish Planning Policy not weaker protection as suggested by Jacobs (1190) and RSPB Scotland (2823). Fife Council considers that the wording of Policy 13 provides appropriate protection for nationally or internationally significant landscape or natural heritage resources and does not need to be amended.
Woodlands

The reference to woodlands in policy 13 is not specific to ancient woodlands so that it can give protection to any woodlands that are considered to have a landscape, amenity or nature conservation value. Policy 13 gives protection to green networks which should help to preserve and prevent the fragmentation of habitat corridors.

The site assessments on biodiversity carried out for FIFEplan identified requirements for 10 metre buffer zones adjacent to areas of woodland to mitigate against potentially adverse impacts of development. It is considered that a buffer zone of 10 metres would provide sufficient protection for woodland in most cases and that the 50 metres buffer zone suggested by The Woodland Trust Scotland whilst desirable would be unreasonable. The requirement for a 10 metre buffer zone adjacent to habitat such as woodland is set out in the draft Making Fifes Places Supplementary Guidance (see CD51 page 17). More detailed consideration/assessment would form part of the planning application process.

Fife Council does not consider it appropriate to reference Annex C (Broad guidance on meeting the acceptability criteria for woodland removal) of The Scottish Government’s Control of Woodland Removal Policy in paragraph 3 of the applying policy 13 section as this would just pick out one part of the policy covered in the document. There may be some merit in referencing Forestry Commission Scotland’s guidance on the Scottish Government’s Control of Woodland Removal Policy in this paragraph as this is more detailed and updated regularly on their website and the Forestry Commission advises Fife Council on government policy in cases where woodland removal is proposed. It is also not considered necessary to specifically refer to the acceptability in principle of woodland removal for renewable energy projects in policy 13 or in the applying policy 13 section.

Carbon Rich Soils

Fife Council’s Minerals proposed Supplementary Guidance provides specific guidance on peat. Fife Council considers that there is merit in including a reference to the Minerals Supplementary Guidance as part of the bullet on Carbon Rich Soils in Policy 13 and invites the Reporter to make an appropriate recommendation on this matter.

Access to water

(Fife Council note: Access issues are covered in Policy 13 rather than Policy 10.)

In response to the comments made by the Royal Yachting Association (1788) Fife Council agrees that Policy 13 should protect access to waterways in order to fully comply with the role planning plays ‘in protecting, enhancing and promoting access to our key environmental resources, whilst supporting their sustainable use’ as identified in Scottish Planning Policy (see CD1 page 45 paragraph 193). Fife Council considers there is merit in adding a reference to access to water to the last bullet point in policy 13 and paragraph 6 of Applying policy 13 and invites the Reporter to make an appropriate recommendation on this matter.

Policy 14: Built and Historic Environment

The support for Policy 14 from SEStran (711), Scottish Natural Heritage (921) and
Stirling Developments (2042) is welcomed.

Jacobs (1192) reference the need for policy 14 to reflect Scottish Planning Policy paragraph 151 with relation to archaeological sites and deposits. However it is considered that Scottish Planning Policy paragraph 150 is the more pertinent paragraph regarding archaeological remains (see CD1 page 35), and that Policy 14 reflects the following key points from paragraph 150:

- Archaeological sites and monuments are an important, finite and non-renewable resource;
- Archaeological sites and monuments should be preserved in situ wherever possible; and
- Where in situ preservation is not possible, planning authorities should, through the use of conditions or a legal obligation, ensure that developers undertake appropriate excavation, recording, analysis.

It is therefore considered that Policy 14 does not need to change to properly reflect Scottish Planning Policy on this issue.

Fife Council considers that there would be merit in adding text to policy 14 relating to enabling development in line with Scottish Planning Policy paragraph 142 (see CD1 page 34) and invites the Reporter to make an appropriate recommendation on this issue.

The following sentence could be added to Policy 14 before the text on archaeological sites and deposits:

"Enabling development will be supported where it can clearly be shown to be the only means of preventing the loss of the asset and securing its long term future."

And the following text in the Applying Policy 14 section after paragraph 7:

"Enabling development should meet a pre-defined need to either prevent the loss of or to enhance a historic building. This may have been identified through the Buildings At Risk Register or through Conservation Area Character Appraisals. It may also be a need that has been identified by communities where built heritage is recognised for important associations. All work to the listed building should comply with Fife Council and Historic Environment Scotland’s policy, advice and standards.

"Enabling development should not be separated from the improvements to a listed building, but the consent for enabling development should be clearly tied to the work to the historic building."

Fife Council agrees with Historic Scotland (3921) that the development requirements for affected proposals should refer to the possible need for archaeological works in connection with the battlefield site at Inverkeithing. This is based on the potential for the sites allocated in the Halbeath/Dunfermline/Pitreavie area to contain archaeological deposits connected with the battle.

Fife Council considers there is merit in including the following advice on historic battlefields for proposals INV006, INV007, INV008, INV009, ROS004, ROS005, ROS006, ROS010, ROS012, ROS014, ROS016, ROS017, DUN030, DUN037, DUN048, DUN049, DUN054, DUN058, DUN055, DUN057 and DUN070 and invites the Reporter to
make an appropriate recommendation on this matter:

“Proposals should have regard to the Inverkeithing Battlefield designation and to apply mitigation as required.”

**Reporter’s conclusions:**

**Spatial Strategy - Heritage**

1. The text of paragraph 25 on page 13 of the proposed plan gives no indication of the value of Fife’s natural and cultural heritage. Buildings are an important part of the heritage, but are not mentioned. The wording of the first sentence appears to separate nature and culture from heritage. For these reasons, the text should be altered. The heading should be expanded to indicate the range of matters encompassed by “heritage”.

**Policy 12: Flooding and the Water Environment**

2. Policy 12, among other things, seeks to avoid detrimental impact on water quality. The reference to “water quality” might be interpreted as referring only to whether water is polluted. Implementation of the Water Framework Directive has the wider aim of taking into account aspects of the biological quality elements of the water environment. For this reason, the wording of the policy should refer to the ecological quality of the water environment.

3. To be consistent with the alteration arising from the preceding paragraph, the wording of paragraphs 9 and 10 on page 238 of the proposed plan should be adjusted.

4. I find that adding to Policy 12 a bullet point that says “conform to the principles of Scottish Planning Policy” would be unsatisfactory for two reasons. First, it would be too vague because Scottish Planning Policy contains a number of policy principles. Second, it is in general undesirable for a policy to refer to some other document. In the interests of clarity, policies should, as far as possible, be self-contained. They should not require reference to another document, especially if that document might be subject to review at a later date.

5. Paragraph 2 on page 238 of the proposed plan implies that civil infrastructure and vulnerable uses might be acceptable in low risk areas. This fails properly to reflect important advice in Scottish Planning Policy (paragraph 263) which says that areas of low to medium risk are generally not suitable for civil infrastructure. The text should be altered to reflect this advice. To ensure that the meaning of paragraph 2 and of Policy 12 itself is clear, the Glossary should include definitions of “civil infrastructure”, “essential infrastructure” and “most vulnerable uses”. With these definitions in the Glossary, the text of paragraph 2 can be shortened.

6. Scottish Planning Policy (paragraph 263) says that water-resistant materials and construction should be used where appropriate. Paragraph 3 on page 238 of the proposed plan does not fully reflect this advice and should be adjusted accordingly.

7. Paragraph 7 on page 238 of the proposed plan includes a statement to the effect that redundant water engineering installations be removed. This should be qualified to
8. I note that paragraph 212 of Scottish Planning Policy says that, firstly, development should only be permitted where the objectives of designation and the overall integrity of the area will not be compromised. The parallel provision in Policy 13 says that development will only be supported where it protects or enhances natural heritage assets. In my view, the protection afforded by Policy 13 is no less than that prescribed in Scottish Planning Policy.

9. Paragraph 212 of Scottish Planning Policy says that, secondly, development should only be permitted where any significant adverse effects are clearly outweighed by certain benefits of national importance. The parallel provision in Policy 13 indicates that where adverse impacts are unavoidable, proposals will be supported if the impacts are satisfactorily mitigated.

10. From the preceding paragraph, I find that Policy 13 fails to recognise that, in terms of Scottish Planning Policy, development that has significant adverse effects may be permitted if the effects are outweighed by the benefits of national importance. The proposed plan should be altered to bring it into line with Scottish Planning Policy. This may best be done by adding to the end of the policy a new paragraph that specifically addresses sites of national importance.

11. It is suggested that, in Policy 13, the paragraph that follows the bullet points be amended to accord with text in paragraph 204 of Scottish Planning Policy. I note that the paragraph in Policy 13 seeks satisfactory mitigation. Paragraph 204 in Scottish Planning Policy is concerned with a somewhat different matter, namely applying the precautionary principle in relation to resources of national or international significance. The context of paragraph 204 is development management rather than development plans.

12. My conclusions are that paragraph 204 in Scottish Planning Policy is of limited relevance to the mitigation paragraph in Policy 13 and that the mitigation paragraph need not be altered.

13. It is suggested that the third bullet point in Policy 13 should include the phrase “in compliance with the Scottish Government’s Control of Woodland Removal Policy”. I find that this would be unsatisfactory. If the guiding principles and criteria contained in The Scottish Government’s Policy on Control of Woodland Removal are to be used as policy in the proposed plan they should be included in policy 13.

14. As pointed out above, it is in general undesirable for a policy to refer to some other document. In the interests of clarity, policies should, as far as possible, be self-contained. They should not require reference to another document, especially if that document might be subject to review at a later date.

15. The proposed plan, in paragraph 3 on page 242, says that, in applying Policy 13, the Control of Woodland Removal policy will be referred to. This adequately indicates
that the relevant government policy document will be taken into account.

16. It is suggested that Policy 13 make specific reference to part of Annex C of the Control of Woodland Removal policy. I note that the third bullet point in Policy 13 applies only to trees and hedgerows that have a landscape, amenity or nature conservation value. Thus the policy does not apply to all trees and woodland. I find it unlikely that the policy will apply to trees grown for the purposes of renewable energy generation or to removal of commercial plantation trees to permit construction of wind turbines. In any case, the policy states that where adverse impacts on existing assets are unavoidable, proposals will be supported where these impacts will be satisfactorily mitigated. In these circumstances, I conclude that the proposed plan should not be altered.

17. Regarding ancient woodland being a finite resource which should be protected, I note that Policy 13 provides for protection of woodlands, including native and other long-established woods. I find that this protection encompasses ancient woodland and adequately meets the concern in the representation.

18. Regarding the suggested provision of a 50 metres wide buffer zone between development and woodland, especially ancient woodland, I note that the council has prepared draft supplementary guidance that addresses the topic of buffer zones. I find that the scope of Policy 13 is sufficient to allow adverse “edge effects” to be taken into account. Sizes and types of buffer zones are matters that may appropriately be addressed in supplementary guidance. These considerations lead me to conclude that the proposed plan need not be altered.

Policy 13: Natural Environment and Access - habitat connectivity

19. Regarding landscape connectivity and habitat corridors, I note that Policy 13 provides for protection of green networks. Paragraphs 4 and 5 on page 242 of the proposed plan give more information. I conclude that the plan affords sufficient protection of and scope for promotion of landscape connectivity and habitat corridors.

Policy 13: Natural Environment and Access - carbon-rich soils

20. There is concern that, in relation to carbon-rich soils, there is no reference to supplementary guidance to help the reader. The Council says that its proposed Minerals Supplementary Guidance will provide specific guidance on peat.

21. Circular 6/2013: Development Planning (paragraph 138) explains that, if supplementary guidance is to be prepared, the plan must refer to such guidance and describe the topics that are to be addressed in the guidance. “There must be a sufficient “hook” in the SDP or LDP policies or proposals to hang the Supplementary Guidance on, in order to give it statutory weight.”

22. I find that it would be helpful to developers and would add clarity to the proposed plan if there were supplementary guidance on the way in which Policy 13 is to be applied to carbon-rich soils. For there to be such guidance, as is made clear by Circular 6/2013, Policy 13 must contain an appropriate reference. The reference could be quite brief if, extra text is added to the “Applying Policy 13” section of the proposed plan. The proposed plan should be altered accordingly. Under Issue 2i Minerals, it is recommended that reference to peat extraction should be added to Policy 15 on
Minerals and cross referenced to this policy. For consistency, a cross reference to Policy 15 should be included in the policy text.

**Policy 13: Natural Environment and Access - access to water-based coastal recreation**

23. Regarding the concern about access to water-based coastal recreation, I note that Scottish Planning Policy, paragraph 193, says that planning plays an important role in protecting, enhancing and promoting access to key environmental resources. In view of this, I find that it would be appropriate to include reference to access to water-based coastal recreation in Policy 13. A consequential amendment to paragraph 6 on page 242 of the proposed plan would then be needed.

**Policy 14: Built and Historic Environment - historic battlefields**

24. It is suggested that development requirements include reference to the second battle of Inverkeithing, the site of which is included in Historic Environment Scotland’s inventory of battlefields. I note that Scottish Planning Policy (paragraph 149) says that planning authorities should seek to protect, conserve and enhance landscape characteristics and special qualities of inventory sites. In view of this, I find that it would be appropriate to refer to the battlefield site in text associated with sites where development is envisaged.

**Policy 14: Built and Historic Environment - archaeological sites and deposits**

25. I note that Scottish Planning Policy, paragraph 150, gives guidance regarding archaeological sites and monuments in general. Paragraph 151 gives particular guidance regarding non-designated historic assets and areas of historic interest. Policy 14 seeks to protect all archaeological sites and deposits, whether designated or not. I find that the protection in Policy 14 adequately reflects the guidance in Scottish Planning Policy.

26. The suggested use of the words “wherever feasible” would be appropriate if Policy 14 were referring only to non-designated features. In fact, the policy encompasses all archaeological sites and deposits. This being so, I find that the wording of the policy accords with the “wherever possible” approach in paragraph 150 of Scottish Planning Policy.

27. My conclusion is that Policy 14 need not be altered.

**Policy 14: Built and Historic Environment - enabling development**

28. I note that paragraph 142 of Scottish Planning Policy says that enabling development may be acceptable in certain circumstances. To accord with this, Policy 14 should include reference to enabling development. Wording suggested in the representation and accepted by the council does not fully accord with Scottish Planning Policy. I find that the latter’s use of the phrase “may be acceptable” is more appropriate as it is possible that enabling development brings into play other material considerations that have to be given consideration.

29. As a consequence of including enabling development in Policy 14, additional text is needed in the “Applying Policy 14” section. Text suggested by the council does not fully reflect advice in paragraph 142 of Scottish Planning Policy. I have therefore in the
I recommend that the following modifications be made:

1. In the “Settlement Plans” section of the proposed plan, in text associated with the following sites:

   INV 006, INV 007, INV 008, INV 009, ROS 004, ROS 005, ROS 006, ROS 010, ROS 012, ROS 014, ROS 016, DUN 030, DUN 037, DUN 048, DUN 049, DUN 054, DUN 058, DUN 055, DUN 057 and DUN 070

   insert the following sentences.

   “The site is within the site of the second battle of Inverkeithing as shown in Historic Environment Scotland’s inventory of historic battlefields. Proposals should have regard to the landscape characteristics and special qualities of the battlefield site.”

2. On page 13 of the proposed plan, delete the heading “Heritage” and put instead:

   “Natural, Built and Cultural Heritage”.

3. On page 13 of the proposed plan, delete the first sentence of paragraph 25 and put instead:

   “Fife’s rich natural, built and cultural heritage assets attract tourism to the area and encourage investment. These assets are protected by policies in the Plan.”

4. In Policy 12: Flooding and the Water Environment, in sub-paragraph 3 of the policy delete “water quality and” and put instead “ecological quality of”.

5. On page 238 of the proposed plan, in paragraph 2 at the end of the first sentence close the bracket, delete all the remaining text and put instead the following.

   “This particularly applies to essential infrastructure and the most vulnerable uses. If essential infrastructure or the most vulnerable uses are proposed in areas where the risk of flooding is 0.1% (1:1,000 years) or greater a flood risk assessment will be required. Low to medium risk areas (where annual probability of flooding is between 0.1% and 0.5% or 1:1,000 years to 1:200 years) are generally not suitable for civil infrastructure.

6. On page 238 of the proposed plan, delete paragraph 3 and put instead:

   “Development will be required to use water-resistant materials and construction where appropriate.”

7. On page 238 of the proposed plan, in paragraph 7 at the end of the third sentence add the following.

   “provided that no increase in flood risk elsewhere has been demonstrated.”
8. On page 238 of the proposed plan, in both of the places in paragraph 9 where “the water environment” occurs insert beforehand the words “ecological quality of”.

9. On page 238 of the proposed plan, in line three of paragraph 10 delete “the quality of water” and put instead “the ecological quality of the water”. In line four of the same paragraph, insert “ecological” before “water”.

10. In Policy 13: Natural Environment and Access, insert at the end of the first bullet point:

“(see Site Appraisal Process below)”

11. In Policy 13: Natural Environment and Access, in the bullet point beginning “Core paths…..” delete “and”, replace it by a comma and insert at the end of the bullet point “and access to water-based recreation”.


“In the particular case of development proposals that affect national sites, such proposals will only be permitted where the objectives of the designation and the overall integrity of the area will not be compromised or where any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.

“With regard to carbon-rich soils, supplementary guidance will be provided as part of the Minerals Supplementary Guidance (see also Policy 15 Minerals).”

14. On page 242, after paragraph 2 insert the following.

“Carbon-rich soils

“Carbon-rich soils such as peat will be addressed in the Minerals Supplementary Guidance. The Minerals Supplementary Guidance will provide detailed advice on the extraction of peat and the information to be provided with regards to handling, storage and restoration of this material.”

15. On page 242, in paragraph 6 delete “and” where it occurs immediately before “bridleways”, replace it by a comma and insert after “bridleways” “and access to water-based recreation”.

16. In Policy 14: Built and Historic Environment, before the paragraph that begins “All archaeological sites…..” insert a new paragraph:

“Enabling development may be acceptable where it can be clearly shown to be the only means of preventing the loss of the asset and securing its long-term future.”
17. On page 244, after paragraph 7 insert a new paragraph:

“Enabling development should meet a pre-defined need either to prevent the loss of or to enhance a historic asset. This may have been identified through the Buildings At Risk Register or through Conservation Area Character Appraisals. It may also be a need that has been identified by communities where built heritage is recognised for important associations. To be acceptable, it must be demonstrated that the enabling development is the only means of preventing the loss of the asset and securing its long-term future. Development should be the minimum necessary to achieve these aims. All work to the asset should comply with Fife Council’s and Historic Environment Scotland’s policy, advice and standards. Enabling development should not be separated from the works that are to be carried out on the asset. Permission for enabling development will be clearly tied to these works.”

18. In the Glossary, add the following definitions.

“Civil infrastructure (in the context of flood risk): Hospitals, fire stations, emergency depots, schools, care homes, ground-based electrical and telecommunications equipment.”

“Essential infrastructure (in the context of flood risk): Essential transport infrastructure and essential utility infrastructure which may have to be located in a flood risk area for operational reasons. This includes electricity generating stations, power stations, grid and primary sub-stations, water treatment works, sewage treatment works and wind turbines.”

“Most vulnerable uses (in the context of flood risk and drainage): Basement dwellings, isolated dwellings in sparsely populated areas, dwelling houses behind informal embankments, residential institutions such as residential care homes/prisons, nurseries, children’s homes and educational establishments, caravans, mobile homes and park homes intended for permanent residential use, sites used for holiday or short-let caravans and camping, installations requiring hazardous substance consent.”
**Issue 2i**

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**Provision of the development plan to which the issue relates:**

Strategy Page 13 (paragraph 24) and Policy 15

**Planning authority’s summary of the representation(s):**

**STRATEGY PAGE 13 (PARAGRAPH 24)**

**General Minerals Comments**

Tina Chapman (7): observes that greater control should be exercised over minerals planning permissions to reduce the environmental impact of such developments.

Bruce Logan (872): indicates that impact on historical/heritage sites should be a factor in deciding minerals planning applications, citing Clatchard Craig and Mare’s Craig as areas destroyed by quarrying.
Everris Ltd (2736): objects to the Proposed plan on the basis that: there should be more
detailed minerals policies contained in FIFEplan (CD5), as in the extant Fife Minerals
Subject Local Plan (CD50), rather than contained in Supplementary Guidance (CD44); the word “minerals” is not defined when used in relation to what is dealt with in Supplementary Guidance; the Proposed Plan only mentions hard rock, gas and coal in indicating what is dealt with in Supplementary Guidance and not peat, which is contrary to Scottish Government policy. Everris Ltd suggests that Policy 16 - Peat, as contained in the draft Supplementary Guidance, should be brought within the Proposed Plan itself.

The Coal Authority (2739 & 2740): expresses support for the way that FIFEplan (CD5) deals with mining legacy issues and the potential need for prior extraction of coal and other minerals to avoid sterilisation of resources, whilst Scottish Natural Heritage (907) indicates that the FIFEplan strategy is largely consistent with Scottish Planning Policy.

Unconventional Gas Extraction, Coalbed Methane and “Fracking”

The West Fife Villages Community Council Forum (2803) and the West Fife Villages Community Projects Group (2821): indicate that the FIFEplan Minerals policy is deficient in that it does not provide an accompanying map showing Petroleum Exploration and Development Licence (PEDL) areas.

Valerie Large (1387): objects to plans to build “the first coal gasification plant in Britain”, indicating that Fife Council should protect the Fife countryside, not destroy it. Darla Eno (2288) is also against unconventional gas extraction, calling it socially and environmentally destructive and suggesting that Scotland should concentrate on renewable sources of energy.

Bruce Logan (873): asks whether there is a specific policy on “fracking”.

POLICY 15

David Wardrope (840): There appears to be a minor inconsistency/ambiguity in the treatment of minerals other than surface coal and sand and gravel. References in Policy 15 should be consistent.

Scottish Natural Heritage (922): Emphasis’s the importance of setting out a clear policy framework for this contentious topic area (unconventional gas) as the relative importance of this technology may change significantly over the lifetime of this plan.

Rob Thompson (1362): Where are the maps detailing the Petroleum Exploration and Development Licences (PEDL)? Suggests that the mineral section requires a "sensitive receptor" treatment even more than carbon energy although the two are inevitably linked.

Kenneth Boyd (2277), Jean Kemp (2281), Juliana Muir (2199), CLEAR (2021), Jean Moore (1469), Rona Lohoar (2086), Moira Adams (1518), Sara Clarke (1585), Carole Egner (2307), Mark Steven (1698), Oonagh O’Brien (2268), Elisa O’Hare (2270), Alexa Morrison (2008), Emma Saunders (2093), Mark Kisby (2252), Judith Kisby (2246, 2250, 2253), Moira Samson (2256), Scott Egner (2335), Muir Mathieson (2926), Katie Roberts (2336) D Burn (2309), Helen Beaton (2284): all object to unconventional gas extraction in Fife on some or all of the following grounds:

- The UK government and Scottish Government are committed to reducing emissions
and increasing renewable energy sources, however the decisions taken on Scottish Government are committed to reducing emissions and increasing renewable energy sources, both of these goals will be set back by UCG extraction. If UCG extraction is to be considered for planning permission, planning regulation requirements are provided that should be included in the plan.

- The Proposed FIFE Plan (CD5) policy position is based on national guidance that is now out of date (Scottish Planning Policy 2010 and National Planning Framework 2, rather than SPP 2012 and NPF3), and which have different emphases on the level of support for unconventional gas development – the newer national guidance is more precautionary in approach; FIFE plan policy should be more neutral in its position as a result;
- A policy position that supports the extraction of CBM, without a full understanding of the climate impacts of the technique is contrary to both the precautionary approach and the low carbon aspirations of NPF3;
- Cites the example of Stirling Council’s Primary Policy 11, which is considered to be more neutral in tone and therefore more in keeping with NPF3;
- Scotland is more than able to meet energy requirements without resorting to these practices.

Fife Council Policy should be amended to reject any licence or other form of application for underground coal gasification and other forms of "fracking" until the public health and environmental implications of this industry have been examined and shared with the wider public in Fife.

- There is enough evidence available to prove that fracking etc. is dangerous and known to contaminate water sources. There has been no health risk assessment done on the effects of chemical pollution from UCG, nor is there any environmental baseline for future pollution;
- Contrary to Scottish Planning Policy and the Climate Change (Scotland) Act 2009. Supporting these industries is incompatible with Fife Council's legal obligation as a public body, under the Climate Change (Scotland) Act 2009, to act in the way it considers the most sustainable. Fracking is a huge step back in our goal to reduce carbon emissions. Scotland has engaged in the most ambitious climate targets in the world. Allowing unconventional gas methods to produce more gas will threaten such targets, and will increase the likelihood of threatening climate change.
- Pollution of air, land and water, seismic events, adverse impact on communities and economy, adverse impact on natural heritage and historic environment, adverse visual impacts, the impossibility of high quality restoration and aftercare;
- Buffer zones are important, and a minimum 2km is proposed, as recommended by Friends of the Earth Scotland (and implemented in New South Wales, Australia), as well as guidance on the impacts on individual houses. There should be baseline monitoring of surface and ground water. Baseline data on water and air quality should be collected 12 months in advance of any permission being granted so that the impact of any energy development can be properly monitored;
- Suggests a change to the draft supplementary guidance on minerals at paragraph 5.3 such that it reads “3. The extraction of coalbed methane will not be supported unless the applicant can demonstrate that there are national or economic interest which would outweigh the community or environmental impacts or that the proposal is environmentally acceptable or can be made so.”; and
- A detailed set of planning conditions is suggested that would be reasonable to provide the minimum level of public health safeguards required in the safe application of UCG, given the particular geology of the Fife and Midland Valley area.
- Would be wise to delay a decision until there is more evidence that the policy would
not be detrimental to the environment of Fife.

Juliana Muir (2199): We do not consider that the Draft Plan (CD5) or Supplementary Guidance (CD44) give adequate consideration to the wider context of the use of fossil fuels at a national and international level, and the compatibility of opening up new frontiers of fossil fuel extraction with the Climate Change (Scotland) Act 2009 and Scottish Planning Policy (CD1), to support the transition to a low carbon economy.

Mark Kisby (2252): Monitoring of planning permissions should be more frequent than every 15 years.

The Coal Authority (2745, 2746, 2748 & 2752): Support Policy 15 as it broadly meets the requirements of SPP.

Proposals Maps should be updated to reflect the existing boundaries of the PEDL Licence areas.

Object to criteria 1 of this policy as it does not fully reflect SPP (CD1) – Amended wording for this criteria has been provided.

The Policy and the Proposals Map should clarify what constitutes the Areas of Search. Also some indication of the five protection notations should either be set out in the LDP, or reference should be made to where this information can be found.

RSPB Scotland (2822): As the environmental impacts of extraction of shale gas, coal bed methane and underground coal gasification are not fully understood, we recommend that a more precautionary approach is adopted in line with new Scottish Planning Policy (CD1). We would also consider a more precautionary approach to be in line with the duty imposed on public bodies Climate Change (Scotland) Act 2009

SEPA (3294): Supports the principles of Policy 15 and particularly support the intention that developments will only be granted planning permission where they do not result in an unacceptable impact on communities, the environment, or the economy.

Hargreaves (3905): It is suggested that a precautionary principle be adopted, that shallow coal reserves are safeguarded, and that options for extraction prior to development are considered.

**Modifications sought by those submitting representations:**

**General Minerals Comments**

Tina Chapman (7) and Bruce Logan (872): are seeking a stronger policy framework in FIFEplan (CD5) to guide decision making on minerals applications and reduce the environmental impact of minerals development, including impact upon historic/heritage sites.

Everris Ltd (2736): suggest that:

- a) more-detailed minerals policies should be contained in FIFEplan (CD5), rather than being contained in Supplementary Guidance (CD44);
b) the word “minerals” should be defined; and  
c) the Proposed Plan should mention peat, as well as hard rock, gas and coal.

**Unconventional Gas Extraction, Coalbed Methane and “Fracking”**

West Fife Villages Community Council Forum (2803) and the West Fife Villages Community Projects Group (2821) would like to see an accompanying map with the FIFEplan Minerals policy showing Petroleum Exploration and Development Licence (PEDL) areas.

Kenneth Boyd (2277), Jean Kemp (2281), Juliana Muir (2199), CLEAR (2021), Jean Moore (1469), Rona Lohoar (2086), Moira Adams (1518), Sara Clarke (1585), Carole Egner (2307), Mark Steven (1698), Oonagh O'Hare (2270), Alexa Morrison (2008), Emma Saunders (2093), Mark Kisby (2252), Judith Kisby (2246, 2250, 2253), Moira Samson (2256), Scott Egner (2335), Muir Mathieson (2926), Katie Roberts (2336) D Burn (2309), Helen Beaton (2284): would like to see some or all of the following modifications to FIFEplan (CD5):

a) inclusion of a policy against unconventional gas extraction;  
b) inclusion of a policy on hydraulic fracturing (“fracking”);  
c) FIFEplan minerals policies based on guidance contained within Scottish Planning Policy 2012 and National Planning Framework 3, with particular reference to guidance on the exploitation of Coalbed Methane, and requiring:  
   i. the prior collection of environmental baseline data;  
   ii. a minimum buffer zone of 2km; and  
   iii. guidance on impacts on individual houses.  
d) a detailed set of planning conditions that would be reasonable to provide the minimum level of public health safeguards required in the safe application of Underground Coal Gasification.

Most of the consultees would also like to see a ban on Underground Coal Gasification and fracking.

**POLICY 15**

David Wardrope (840): References should be consistent with regard to the treatment of minerals other than surface coal and sand and gravel.

The Coal Authority (2745, 2746, 2748 & 2752) requests the following changes:

a) The Proposals Map should be updated to reflect the latest position with regard to PEDL Licences.  
b) The title “Unconventional Gas” should be changed to “Unconventional Hydrocarbons”.  
c) The start of Policy 1 should be reworded to read:

“Development proposals for the extraction of minerals, coal bed methane, shale gas, or coal bed gasification, including associated infrastructure, will only be supported where they:  
1. Do not result in an unacceptable impact on communities, the environment, or the economy;  
2. Provide for restoration and aftercare to a high standard, including the provision of
an appropriate guarantee, such as bonds or other financial guarantees; and
3. In the case of aggregates, facilitate a minimum 10 year landbank of permitted
reserves for construction aggregates at all times in all market areas.
Consideration will also be had to the benefits to the local or national economy the
development may bring. Development must also meet the relevant requirements set
out in the Minerals Supplementary Guidance.”

Summary of responses (including reasons) by planning authority:

STRATEGY PAGE 13 (PARAGRAPH 24)

General Minerals Comments

Tina Chapman (7), Bruce Logan (872), Everris Ltd (2736), The Coal Authority (2739 &
2740) and Scottish Natural Heritage (907): The policy framework detailed in the Local
Development Plan, in conjunction with additional advice given in the draft Minerals
Supplementary Guidance (CD44), is considered to be adequate to deal with existing and
emerging minerals matters. Cognisance has been taken of Fife Council’s
archaeologist’s comments, and those of Scottish Natural Heritage/Historic Scotland, as
part of the FIFEplan preparation. Scottish Natural Heritage indicates that the FIFEplan
strategy is largely consistent with Scottish Planning Policy (CD1).

Unconventional Gas Extraction, Coalbed Methane and “Fracking”

Rob Thompson (1362), West Fife Villages Community Council Forum (2803) and the
West Fife Villages Community Projects Group (2821): Unconventional Gas Extraction,
Coalbed Methane and “fracking” can be dealt with under the existing and proposed
framework of minerals policy and supplementary guidance, which only allow minerals
operations to occur under circumstances where the environment is not unduly harmed.

PEDL licence areas are published in the Area of Search maps in the hard copy
document and in the online mapping.

POLICY 15

David Wardrope (840): Comments noted and agreed. Fife Council considers that there
is merit in the “Areas of Search” paragraph of Policy 15 Minerals being re-written for
clarity and invites the Reporter to make an appropriate recommendation on this issue. A
possible re-wording could be as follows:

“All applications for surface coal and sand and gravel extraction will be considered
within the context of the areas of search highlighted in the accompanying mapping.”

Scottish Natural Heritage (922): Comments noted. The Minerals Supplementary
Guidance (CD44) provides more detail to support Policy 15.

Kenneth Boyd (2277), Jean Kemp (2281), Juliana Muir (2199), CLEAR (2021), Jean
Moore (1469), Rona Lohoar (2086), Moira Adams (1518), Sara Clarke (1585), Carole
Egner (2307), Mark Steven (1698), Oonagh O’Brien (2268), Elisa O’Hare (2270), Alexa
Morrison (2008), Emma Saunders (2093), Mark Kisby (2252), Judith Kisby (2246, 2250,
2253), Moira Samson (2256), Scott Egner (2335), Muir Mathieson (2926), Katie Roberts
Unconventional Gas Extraction, Coalbed Methane and “fracking” can be dealt with under the existing and proposed framework of minerals policy and supplementary guidance, which only allow minerals operations to occur under circumstances where the environment is not unduly harmed.

The draft Minerals Supplementary Guidance (CD44) has been written to update Fife Council policy to concur with the revised national policy framework with regard to unconventional gas. The national guidance on these matters takes account of stated climate change targets.

Fife Council does not issue UCG/PEDL Licences; these are dealt with by the UK Government in conjunction with appropriate regulatory bodies and The Coal Authority. There is currently a Scottish Government moratorium on unconventional oil and gas developments in Scotland (SD1). There is to be a public consultation on unconventional oil and gas extraction undertaken by the Scottish Government latter this year. The outcome of this consultation will be reflected in an updated Minerals Supplementary Guidance.

The Coal Authority (2745, 2746, 2748 & 2752): Support for Policy 15 – Minerals is noted and welcomed.

PEDL Licence maps have been updated.

Fife Council considers that there is merit in the proposed amendments suggested by the Coal Authority to the opening section of Policy 15 – Minerals, and in the suggestion to rename “Unconventional Gas” to “Unconventional Hydrocarbons”, and invites the Reporter to make an appropriate recommendation on this issue.

Given that minerals can only be worked where they lie, the Areas of Search mapping adopts a Fife-wide coverage that is then layered with various levels of protection based on the particular constraints and circumstances of the particular location. Policy 15 – Minerals should, in this respect, be read in conjunction with the advice given in the draft Minerals Supplementary Guidance (CD44).

RSPB Scotland (2822): Comments noted.

Scottish Environment Protection Agency (3294): Support noted.

Hargreaves (3905): Policy 15 has a section on Minerals sterilisation and encourages prior extraction of minerals where possible.

**Reporter’s conclusions:**

**Minerals: general**

1. Scottish Planning Policy recognises that minerals make an important contribution to the economy. The guidance sets out the policy principles and requires local development plans to safeguard all workable mineral resources of economic or conservation value. Responsible use of resources should be facilitated. Indeed, the Coal Authority has explained that Fife contains coal resources capable of extraction over a significant part of southern and eastern Fife.
2. Although some concern has been expressed about the lack of strength of the minerals policy and the inadequate level of detail included, I agree with the Coal Authority and Scottish Natural Heritage that the policy is largely consistent with the guidance contained in Scottish Planning Policy and is fundamentally sound.

3. The requirement to protect the environment from an unacceptable impact provides adequate scope to assess development in terms of any potential harmful effect, including impact on the historic environment and heritage features. There is the potential to provide adequate buffer zones taking into account the nature of any particular proposal and the characteristics of the location, including “sensitive receptors”, where mineral extraction is intended. This approach accords with the guidance in Scottish Planning Policy.

4. Although the use of such words as “acceptable” and “appropriate” has been questioned, at the end of the day, it is a matter for the judgement of the decision-maker as to whether any particular development proposal, in its own right or cumulatively, is appropriate or would have an unacceptable impact.

5. Concern has also been expressed about the lack of any consideration of the wider international context of mineral extraction but I consider that the scope of the policy, supported by the draft supplementary guidance, is suited to the content of a local development plan.

6. Overall, I conclude that Policy 15, Minerals, supported by the terms of the draft Minerals Supplementary Guidance will provide adequate development management advice to enable the assessment of proposed extraction over the full range of minerals.

Unconventional gas extraction, coalbed methane and “fracking”

7. Requests have been made for the inclusion of a specific policy for unconventional extraction methods, including hydraulic fracturing. I note, significantly, that Scottish Planning Policy does not indicate that there should be a presumption against unconventional forms of gas development. The guidance requires conditions of planning permission to ensure that hydraulic fracturing does not take place where permission for such operations has not been sought.

8. Paragraph 3 of the supporting text explains that the policy relates to a range of minerals including “unconventional gas” which, in turn, includes coalbed methane and shale gas extraction known as “fracking”. Paragraph 10 of the text further explains that “An array of planning and regulatory measures apply to potential gas developments”. The policy itself is clear in stating that support for development proposals for mineral extraction will only be provided where an unacceptable impact on communities, the environment, or the economy would not result. As this relates to all forms of extraction, I conclude there is not a requirement for a specific “fracking” policy.

9. In any event, the Scottish Government has imposed a moratorium on unconventional oil and gas development which is defined as “development involving the onshore exploration, appraisal or production of coal bed methane or shale oil and gas using unconventional extraction techniques, including hydraulic fracturing.” A Direction has been made requiring planning authorities to notify the Scottish Ministers of any planning application for unconventional oil and gas development which it is proposed to approve. In effect, pending consideration of the proposal by the Scottish Ministers, planning
permission must not be granted. I believe this approach to accord with the precautionary principle advocated by several of those making representations.

10. A Scottish Government consultation exercise is currently taking place and is intended to continue until the spring of 2017. The consultation is likely to involve the concerns of those making representations in respect of the proposed plan including the potential for pollution of air, land and water and seismic disturbance along with any consequential environmental impacts.

11. In due course, the Scottish Ministers will determine their policy towards unconventional oil and gas development. At that time it may be necessary to modify the terms of Policy 15. In the meantime, the policy is required to provide a development management basis for the assessment of any mineral-related applications that may be submitted. As indicated above, these may include proposals falling within the scope of unconventional oil and gas development.

12. The moratorium does not apply to the submission of applications for development of this nature and, as I have previously concluded, the policy provides an adequate basis for the consideration of any such proposals. Although reference has been made in some representations to proposals for a coal gasification operation, the council is unaware of any specific proposal for such a process. Any proposals involving unconventional oil and gas development such as gasification would be subject to the terms of the Direction.

Policy 15, Minerals

13. The council accepts the suggested addition to the policy by the Coal Authority. I agree that this accords with the provisions of Scottish Planning Policy. The council also accepts the alteration to that part of the policy dealing with Areas of Search. I agree that the amended wording adds clarity. I further note the council’s agreement that the sub-heading “Unconventional Gas” should be renamed “Unconventional Hydrocarbons”. However, this is only a suggestion made by the Coal Authority and I consider that “unconventional gas” is a more widely recognised generic term and should be retained.

14. Although concern has been expressed about the lack of a map showing the Petroleum Exploration and Development Licences, details of the licence areas are included in the Map Folder on the map showing the Area of Search for Surface Coal. The council has explained that the United Kingdom Government issues the licences. The council has also confirmed the information has been updated to reflect the current situation. For clarity and ease of locating, I believe it would be helpful to amend the title of the map to make reference to the licence areas.

15. Attention has been drawn to the reference in the supporting text to monitoring planning permissions every 15 years. As explained in Scottish Planning Policy, mineral permissions should be reviewed every fifteen years when the opportunity should be taken to apply up-to-date operating and environmental standards. As also indicated in guidance, the council should ensure that rigorous procedures are in place to monitor consents at appropriate intervals and ensure that commensurate action is taken when necessary. The proposed plan should be modified to clarify the procedure.

16. Scottish Planning Policy includes peat in that part of the document dealing with “Promoting Responsible Extraction of Resources”. It is appropriate that Policy 15,
Minerals, also encompasses peat and a reference to this effect should be included in both the introductory text and the policy itself.

17. There is no definition of “minerals” in the proposed plan but the draft Minerals Supplementary Guidance contains definitions and descriptions of all types of minerals. Reference to peat, along with coal, hard rock and unconventional gas, is included within the guidance, intended to become part of the development plan following the adoption of the proposed plan. Accordingly, there is no requirement to provide a definition of minerals in the proposed plan.

18. Detailed guidance on commercial peat cutting is included in the section of the supplementary guidance providing “Specific Minerals Guidance” and therefore is also not required in the proposed plan. However, it would be appropriate for the policy to draw particular attention to peat, the restrictions set out in Scottish Planning Policy and Policy 13 Natural Environment and Access which also refers to peat. (See Issue 2h The Environment and flooding).

**Reporter’s recommendations:**

I recommend that the following modifications be made:

1. In the introductory text, on page 247, under “Outcome”, insert the following:

   “, including commercial peat extraction,” after “…impacts of minerals extraction”.

2. In Policy 15, Minerals, amend the paragraph following criterion 3 as follows:

   “Consideration will also be given to the benefits the development may bring to the local or national economy. More detailed advice is contained in the Minerals Supplementary Guidance and attention is drawn to the restrictions on peat extraction which reflect Scottish Planning Policy (see also Policy 13 Natural Environment and Access).”

3. On page 248, amend the first sentence of paragraph 8 as follows:

   “All applications for surface coal and sand and gravel extraction will be considered within the context of the areas of search highlighted in the accompanying mapping.”

4. On page 248, amend paragraph 6 as follows:

   “Arrangements will be in place to review mineral consents every 15 years. Consents will be monitored as appropriate.”

5. In the Map Folder, amend the title of the map “Areas of Search for Surface Coal” to:

   “Areas of Search for Surface Coal and Petroleum Exploration Development Licence Areas”
<table>
<thead>
<tr>
<th>Issue 2j</th>
<th>Other Policy Issues</th>
</tr>
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<tbody>
<tr>
<td>Development plan reference:</td>
<td>N/A</td>
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**Body or person(s) submitting a representation raising the issue (including reference number):**

- The Thousand Huts Campaign (101)
- Mobile Operators Association (139)
- Shell UK Limited (500, 501)
- Scottish Natural Heritage (923)
- Scottish Enterprise (1062)
- Jacobs (1193, 1209)
- BP North Sea Infrastructure (1247)
- Ceres and District Environment and Amenity Protection Group (1811)
- Gladman Developments Ltd (2761)
- Scottish Government (3209)

**Other comments on the policies**

- The Thousand Huts Campaign (101): Promotion of inclusion of Scottish Government definition of huts.
- Mobile Operators Association (139), Scottish Government (3209): Telecommunications infrastructure has a vital role to play in the economic and social fabric of an area and policies should be included in the plan to support the telecommunications sector.
- Scottish Enterprise (1062): Greater clarity of the potential scale of employment allocations and elevation of the status of some sites.
- SNH (923): Clarity of flowchart on Page 190 could be improved.
- Jacobs (1209, 1193): Criteria need to be identified for assessing wind farms and there is a need to have a specific policy on renewable energy.
- Ceres and District Environment and Amenity Protection Group (1811): Departure hearings are useful for decision takers and should be retained.

**Provision of the development plan to which the issue relates:**

Numerous Policy areas

**Planning authority’s summary of the representation(s):**

- Shell UK Ltd (500, 501), Roger Laird (1247): Raise concern about the removal of policy covering safeguarding areas and the text which refers to the need to consult with the Health and Safety Executive.
- The Thousand Huts Campaign (101): Promotion of inclusion of Scottish Government definition of huts.
- Mobile Operators Association (139), Scottish Government (3209): Telecommunications infrastructure has a vital role to play in the economic and social fabric of an area and policies should be included in the plan to support the telecommunications sector.
- Scottish Enterprise (1062): Greater clarity of the potential scale of employment allocations and elevation of the status of some sites.
- SNH (923): Clarity of flowchart on Page 190 could be improved.
- Jacobs (1209, 1193): Criteria need to be identified for assessing wind farms and there is a need to have a specific policy on renewable energy.
- Ceres and District Environment and Amenity Protection Group (1811): Departure hearings are useful for decision takers and should be retained.
Modifications sought by those submitting representations:

- Shell UK Ltd (500, 501), Roger Laird (1247): Inclusion of text or policy to highlight presence of consultation zones.
- The Thousand Huts Campaign (101): Inclusion of Scottish Government definition of huts in glossary.
- Mobile Operators Association (139), Scottish Government (3209): Inclusion of policy and supporting wording aimed at promoting and addressing the specific impacts of telecommunications infrastructure. Text is provided in the response.
- Scottish Enterprise (1062): Add site capacities to all employment land allocations and re-designate all employment sites along the Fife Energy corridor as strategic employment sites.
- SNH (501): Change flowchart on Page 190 as ticks and crosses are confusing and do not make the process clear.
- Jacobs (1209, 1193): Addition of policy on renewables and addition of list of criteria covering the impacts that wind energy development should address.
- Ceres and District Environment and Amenity Protection Group (1811): Add reference to departure hearing to ‘A guide to FIFEplan Policies’.

Summary of responses (including reasons) by planning authority:

Policy 1 has been designed to identify the key principles that will determine both the process through which an application will be determined and which they must address to be recommended for permission.

The other 14 supporting policies provide a large amount of subject specific information. There is no need to duplicate the issues covered between the supporting policies because all applications are considered through Policy 1. Therefore issues such as landscape protection, infrastructure and amenity are covered more fully in their own specific policies without the need for duplication or cross referencing. To add further cross referencing or issues into the supporting policies that are not covered in Policy 1 would make the plan unworkable.

Shell UK Ltd (500, 501), Roger Laird (1247): One of the reasons behind the new approach in the plan is to differentiate between those statements which are policy and those which are covered by other legislation or statements on direction how the policy will be implemented.

In these areas the Health and Safety Executive area automatically consulted so there is no need have a policy which would be replicating a process which already occurs. We also retain the mapped information showing the presence of these consultation zones so we are aware when applications are submitted in these areas.

The issue relates to a statement of fact i.e. is it in a consultation zone or not. It is therefore difficult to cover under a policy approach which focuses on the suitability of
development proposals and the impacts it may have. Therefore no change is proposed. The Thousand Huts Campaign (101): Huts are not mentioned in the plan so there is no need to reference them in the Glossary.

Mobile Operators Association (139), Scottish Government (3209): Fife Council agrees that telecommunications are important for the functioning of the area. However we believe that the policy framework provided allows for proposals of this nature to be fully considered.

This plan does not have this in line with SPP which, as quoted in the response, looks for Local Development Plans to ‘provide a consistent basis for decision making by setting out the criteria which will be applied when determining planning applications …’.

The response sets out a policy for inclusion. It has four parts, each of which is already covered in the Local Development Plan. The issues are covered in the following places:

i) Impact on visual amenity and surrounding area – covered in Policy 1 B (6,) (7) and Policy 10 and 13.
ii) Impact of design – Policy 1 C (7) and Policy 14.
iii) Use of existing buildings – this is advice and not policy and could be covered in any pre application discussions.

The remainder of the recommended text relates to context of the importance of the telecommunications industry and infrastructure. The LDP has intentionally deviated away from such wording which simply discusses the merits of different types of development to concentrate on the issues that will determine the suitability of an application. The support and merits for the telecommunications industry are covered in numerous other Fife Council documents.

Therefore there is no need to change the policies in the plan as the issues requested in the response have already been covered in the plan’s text.

Scottish Enterprise (1062): The capacity of employment sites would be difficult to calculate given the range of uses often identified for each site. The comparison with housing is not ideal as there is more certainty about the use and general size of each unit which allows a capacity to be ascertained.

Some of the sites in the Fife Energy Corridor are already strategic employment sites. But to make a blanket designation of all sites in the areas as strategic land would not be appropriate as some will only serve a local market. Therefore no change should be made and the role of sites should be considered on an individual basis.

SNH (501): The support for the principle of the diagram is welcome but it is accepted with hindsight that the diagram could be clearer. Although not required for the functioning of the plan, for the sake of clarity the diagram could be amended. However this is a presentational issue and will be addressed by the Council following the Examination, ensuring that that the content of the diagram is not materially changed.

Jacobs (1209, 1193): There is no need to include such a policy as the criteria included in SPP covering wind energy are all covered in the LDP. Policy 1, 10, 13 and 14 all cover issues to do with impact on amenity and would The impacts that need to be addressed
in relation to wind farms are no different to many other types of development. Key issues such as landscape impact, impact on communities and ecological impact are comprehensively covered in the LDP. To add in a specific policy on renewables or wind energy would contradict the approach being taken in the LDP which focuses policy on addressing the impacts of land use change, rather than having as series of policies on each development type.

Due to the timing of the production of the LDP and the revised SPP not all the issues in the new SPP could be addressed. Therefore it is more relevant to consider the LDP against the 2010 SPP and its compatibility with the renewable energy policy. It should be noted that Fife Council does not agree with the methodology set out in SPP for the identification of spatial frameworks. While it is recognised that its aim is to provide consistency across the country, the removal of the issue of landscape from the frameworks is unhelpful in providing a clear guidance for wind energy applications. Landscape impact is one of the key issues that will determine the suitability of a wind energy application and to leave it off any framework gives a false impression of opportunity. By leaving this out of the frameworks the methodology in SPP 2014 always leads to final frameworks that identify the areas that would be least appropriate for wind energy development. It has to be questioned whether this approach fits in with the wider environmental considerations of SPP.

This issue is covered in more detail in the Schedule on Policy 11.

Ceres and District Environment and Amenity Protection Group (1811): Departure hearings are part of the process for considering certain applications. There is not considered to be a need to make a specific reference to these in the Local Development Plan.

**Reporter's conclusions:**

**Other Policy Issues – Protection and Safeguarding of Oil and Gas Pipelines**

1. The proposed plan does not include policy provision for protecting and safeguarding oil and gas pipelines. Scottish Planning Policy indicates that strategic development plans and local development plans outwith the strategic plan areas should identify any nationally important clusters of industries handling hazardous substances within their areas and safeguard them from development which, either on its own or in combination with other development, would compromise their continued operation or growth potential. Additionally, it indicates that proposals for development in the vicinity of major accident hazard sites should take into account the potential impacts on the proposal and the major accident hazard site of being located in proximity to one another.

2. Important oil and gas pipelines cross the proposed plan area, such as the Shell NGL pipeline system and the BP Forties pipeline. I agree with the council that policies which cover an existing, well established process for handling planning applications, add very little to a local development plan, and I note that the relevant policies in the 3 adopted local plans currently in place are focussed, in the main, on such processes. Nonetheless, it is my view that the lack of a meaningful reference in the proposed plan to the approach to be taken to development proposals within the consultation distances for hazardous installations means that it is failing to provide proper guidance on an important land use planning matter. As such, I consider that it is inconsistent with the
underlying thrust of Scottish Planning Policy, which addresses this issue, and with Circular 6/2013: Development Planning, which indicates that local development plans should have regard to issues arising out of the European Directive on the control of major accident hazards involving dangerous substances.

3. I acknowledge that there is no representation from the Health and Safety Executive. However, 2 operators have lodged representations. I also note that, in addition to oil and gas pipelines crossing the plan area, National Planning Framework 3 indicates that the Fife Energy Corridor, which extends from Methil to Longannet, has potential for significant investment in energy related business development. The hazardous installations in place, including the pipelines, could potentially support the development of this corridor. In all the circumstances, I consider that it would be prudent to insert a further policy in the proposed plan outlining the approach the council should take to proposals within consultation distances. An appropriate approach would be to require such proposals to demonstrate that they do not, individually or cumulatively, result in an increase in risk to the safety and health of the public and the environment.

4. Given the structure of the proposed plan, and the small number of policies and their nature, I do not believe that a separate policy as set out in the adopted local plans and the representations, would be appropriate. Instead, I believe that the issue could be dealt with satisfactorily as a part of Policy 5: Employment Land and Property. This would reflect the fact that Scottish Planning Policy includes its policy on this issue in the Supporting Business and Employment chapter. The role of the Health and Safety Executive, and the role of the facility’s operators and owners, and the identification of the consultation distances on the Proposals Map, which would all help users of the plan, can reasonably be referred to in the Applying Policy 5 text. I am not persuaded that additions along these lines would make the proposed plan unworkable, as feared by the council.

5. Overall, adjustments are required to the proposed plan, as set out below.

Other Policy Issues – Communications/Digital Infrastructure

6. Policy 3: Infrastructure and Services provides support for development proposals which ensure the delivery of information communication technology and high speed broad band connections.

7. Scottish Planning Policy goes further than this by indicating, amongst other things, that the planning system should support infrastructure provision which is sited and designed to keep environmental impacts to a minimum. It also explains that local development plans should provide a consistent basis for decision making by setting out the criteria which will be applied when determining planning applications for communications equipment, ensuring that certain options are considered when selecting sites and designing base stations, and setting out matters to be addressed in planning applications for specific developments.

8. The planning authority suggests that the impacts of communication equipment on visual amenity, design, and ecology, and the use of existing buildings are covered by various policies in the proposed plan, including Policies 1, 10, 13 and 14. While I accept that these policies would be relevant in assessing development proposals for communications equipment, they are very general in nature, and do not cover all the matters referred to in Scottish Planning Policy. In particular, I believe that it is necessary
to ensure that an overly restricted approach is not adopted, bearing in mind that Scottish Planning Policy goes no further than requiring that environmental impacts be kept to a minimum and recognising, in broad terms, that the possibilities for design and siting may be limited by technical requirements and constraints. In failing to deal more fully with the matters referred to in Scottish Planning Policy, I am concerned that the proposed plan is not providing adequate guidance on the approach to be taken to planning applications for communications equipment. In the circumstances, I believe that it would be appropriate to insert a further policy on this matter in the proposed plan.

9. Given the structure of the proposed plan, and the small number of policies and their nature, I do not believe that a separate policy as set out in the adopted local plans and representations, would be appropriate. Instead, I believe that the issue could be dealt with satisfactorily as a part of Policy 3: Infrastructure and Services, which already includes a reference to information communication technology. The importance of high quality digital infrastructure, and the need for development proposals for communications equipment to provide various technical details, including details of the alternatives considered, visual assessments (where appropriate), and declarations regarding exposure to radiofrequency radiation can all reasonably be dealt with in the supporting text. I am not persuaded that additions along these lines would make the proposed plan unworkable, as feared by the council.

10. Overall, adjustments are required to the proposed plan, as set out below.

Other Policy Issues – The Capacity of Employment Sites

11. The settlement and countryside plans section of the proposed plan shows estimates of the capacity (ie size) of employment sites, where this information is available. The size figure is included in the box marked “area” in the summary heading for each proposed allocation in the proposed plan. It is not included in the box marked “capacity” because this is clearly only meant to show the number of houses where housing either comprises all or part of a proposal. The housing capacity figure is important because this shows the contribution that each site can make to the housing land requirement.

12. Where housing and employment are proposed as part of the same allocation, as in the strategic development area allocations, the summary heading highlights the overall size of the site in the area box, and the number of houses proposed in the estimated capacity box. Such allocations are often large and housing led, and can involve other uses. Details of the size and type of the employment allocations, and details of any other uses, are found in the box marked “status, additional development requirements, and other information”. As the size of the employment part of the allocation is generally provided, I can see little benefit to be gained from repeating it in the capacity box along with the housing numbers. In particular, I note that only a modest amount of text is provided in total for each of these allocations, and that the figure is quite easy to find. I agree with the council that to calculate the employment capacity of a site for the local development plan on any basis other than the size would be difficult because of the range of uses, with varying requirements, that could potentially be accommodated. The calculation for the estimated housing capacity of a site is based on well established processes.

13. Turning to the description of employment land in the proposed plan on the key employment sites along the Fife Energy Corridor, I am not persuaded that it would be
appropriate to change the description box for each proposed allocation from employment to strategic employment. I note that in the description boxes, the council has consistently described proposed employment allocations as employment across the council area. I am not persuaded that it would be appropriate to describe strategic employment sites as strategic employment in just one part of the council’s area, albeit that the energy corridor is of importance. Such a change would introduce an inconsistency into the way employment sites are described across the plan area, and could potentially cause some confusion for users of the plan. I am also concerned that to describe them all as strategic employment sites would be misleading, given the council’s response that not all sites along the corridor are strategic and that some only serve a local market. The approach to strategic employment land, the key settlements in which strategic employment sites are located, and the employment designations for individual sites, are all set out in the Fife Employment Land Strategy 2014-2021 and its supporting Technical Report, and I consider this to be a sufficient and reasonable approach. For the avoidance of doubt, I can also see no great advantage to be gained from describing all sites designated strategic in the Technical Report as strategic in the settlement plans. I would be concerned that this may result in a more inflexible approach to the development of these sites. I am satisfied that referring, in general terms, to the importance and delivery of strategic sites in the part of the proposed plan dealing with Fife’s Spatial Strategy is all that is required, as highlighted in Issue 2d – Employment Land.

14. Overall, no adjustments are required to the proposed plan.

Other Policy Issues – Remaining Ones

15. Paragraph 12 of the guide to policies section of the proposed plan (page 189) sets out criteria for considering whether proposals are significantly contrary to the development plan, and indicates that those proposals would follow a longer reporting route before the council takes a decision. I believe that to add a reference to departure hearings in this part of the proposed plan is unnecessary because the need for hearings, including those for major developments which are significantly contrary to the development plan, is covered by statute (Section 38A of the 1997 Town and Country Planning [Scotland] Act [as amended] and Regulation 27 of the 2013 Town and Country Planning [Development Management Procedure][Scotland] Regulations) and because the council already appears to have established procedures in place for holding hearings in planning cases.

16. The council agrees that the diagram on page 190 of the proposed plan, which seeks to show the policy sequence applying to the assessment of a development proposal, could be clearer. I note that the representation supports the principle of such a diagram, and I believe that it has the potential to be helpful to users of the proposed plan. I agree with the council that amending it is a matter of presentation, and constitutes a technical change. Following a further information request (FIR 34), the council has lodged a revised diagram, which reasonably clarifies the policy sequence to be used in assessing proposals. In these circumstances, I am satisfied that the revised diagram should replace the one in the proposed plan.

17. The representation relating to renewable energy (Mr R McDonnell [1209][1193]) is dealt with in Issue 2g – Low Carbon and Renewable Energy, and the one relating to the definition of huts (Reforesting Scotland – The Thousand Hut Campaign [101]) is dealt with in Issues 1 – General Comments, and 2f - Countryside.
Reporter's recommendations:

I recommend that the following modifications be made:

1. In Policy 5: Employment Land and Property, page 207, add a new section at the end of the policy to read:

   “Safety

   Within the consultation distances for hazardous installations (including pipelines), development proposals will require to demonstrate that they do not, individually or cumulatively, result in an increase in risk to the safety and health of the public and the environment.”

2. In the Applying Policy 5 section, page 208, add a new paragraph at the end of the section to read:

   “9. There are hazardous installations in the area, and important pipelines associated with the oil and gas industry cross it. There are stringent controls in place on development in their vicinity, and consultation distances have been established for them. In coming to a decision on development proposals within the consultation distances, the council will take full account of advice from the Health and Safety Executive, and will consult the facility’s operators and owners. Consultation distances are identified in the plan on the Proposals Map.”

3. In the Proposals Map, add the consultation distances for hazardous installations (including pipelines) in the plan area.

4. In Policy 3: Infrastructure and Services, page 199, add a new section at the end of the policy to read:

   “Communications Equipment supporting Digital Connectivity

   Development proposals for communications equipment will be supported where they have been positioned and designed to avoid unacceptable effects on the natural and built environment.

   Development proposals must also demonstrate that they have considered options for minimising the impact of the equipment, including:
   (i) the potential for mast or site sharing;
   (ii) installation on existing buildings or structures;
   (iii) installing the smallest suitable equipment (which should be the smallest suitable, commensurate with technological requirements); and
   (iv) measures for concealment or disguise.

   Development proposals should also address the cumulative effects of a proposal in combination with existing equipment in the area.”
5. In the Applying Policy 3 section, page 202, add a new sub-section at the end of the section to read:

“Communications equipment

26. Scottish Planning Policy recognises the economic and social benefits of having high quality digital infrastructure in place, and the need for the planning system to support infrastructure provision which is sited and designed to minimise environmental impacts.

27. Development proposals for communications equipment should: address how they fit into the wider communications network; set out the siting and design options which satisfy operational requirements, the alternatives considered, and the reasons for the chosen solution; and provide full details of the design, and a visual assessment (if appropriate), and a declaration that the equipment and installation is designed to be in full compliance with the appropriate International Commission on Non-Ionising Radiation Protection guidelines for public exposure to radiofrequency radiation.”

6. In A Guide to the Fifeplan Policies section, pages 189-190, delete the policy sequence diagram on page 190, and replace it with the policy sequence diagram attached to the response from the council to FIR 34, dated 8 February 2016, relating to Issue 2j – Other Policy Issues.
### Issue 3a: Spatial Strategy

**Development plan reference:** Fife Spatial Strategy (pages 9-12)  
**Reporter:** Katrina Rice

**Body or person(s) submitting a representation raising the issue (including reference number):**

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<tr>
<th>Spatial Strategy</th>
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<td>D Wardrope (654)</td>
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<td>SEStran (710)</td>
<td>J G Lang &amp; Son (2172)</td>
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<td>Taylor Wimpey (876)</td>
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<td>Scottish Enterprise (1013)</td>
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<td>Glenrothes Area Futures Group (1326)</td>
<td>Hazel McIntosh (2505)</td>
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<td>Rose Dorman (1445)</td>
<td>Greg McShane (2717)</td>
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<td>Max Taylor (1770)</td>
<td>Gladman Developments Ltd (2771)</td>
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<td>Linlathen Developments (Tayside) Limited (2116)</td>
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**Provision of the development plan to which the issue relates:** Page 9 – 11 Paragraph 1 – 7

**Planning authority’s summary of the representation(s):**

Rose Dorman (1445) Objection based on concerns for health of humans and environmental impact. Proposed development would have immediate negative impact on local and highway access causing costs to services. Proposed Development Plan has potential for adverse environmental impact to wider Fife and connecting towns. Has potential to put the health, growth and development of children at risk. Can see no guarantee that all safety issues will be observed. The development is connected with hazardous materials. The effect of a breach of safety e.g. escape of noxious gases, would be irreversible. Resulting aftermath financial cost to Fife Council, if proposal was accepted, would far exceed monies invested upfront by the company proposing this plan. Urge Fife Council to reject this plan and protect the land and community.

Glenrothes Area Futures Group (1326) GAFG seek clarification in the FIFEplan of the equal status of Dunfermline, Glenrothes and Kirkcaldy as in the Mid Fife Plan, and SESplan. These areas are virtually equal in population and all three are central in their
own ways to be major development centre areas.

Stirling Developments (3678) Stirling Developments are generally supportive of the approach of the Spatial Strategy. The Proposed Local Development Plan encourages development of high quality and of raising standards in greenspace and green networks.

The allocation at Broomhall was amended, prior to adoption of the Dunfermline and West Fife Local Plan, to create a more appropriate landscape framework within which the Broomhall neighbourhood can best use the site. For example responding to long range views from the Abbey and Pittencrief Park. We support the Council in its drive for high quality development respecting Fife’s important environmental assets.

We note and support the Strategy for employment, housing and local services in proximity to sustainable and healthier lifestyles making best integration with existing communities. The strategy diagram (Figure S3) reflects this approach and we note, under ‘Place’, the Dunfermline SDA, close to existing settlements is identified as an area for growth as part of the Local Development Plan.

Kirsteen Shaw (3916) The adverse environmental impacts in regards to the land have not been addressed. Neither has the additional impact that the volume of heavy traffic will cause on the environment and health of local people e.g. in the East Neuk.

Taylor Wimpey (3691), Lynch Homes (3709), Avant homes (3695) supports the spatial strategy. ‘where ...economic activity has recovered, and building is at a higher level of activity than at present resulting in sustainable economic growth’. Taylor Wimpey supports the aspirations for economic activity, new homes and high quality environment. To ensure these aspirations are achieved, it is vital that FIFEplan identifies and allocates a generous supply of effective housing land to meet the housing land requirement in full.

Plan does not conform with Scottish Planning Policy or Strategic Development Plans as its end date is 2026 rather than 2024.

Transport Scotland (3216) suggests Fife Council has not done enough to comply with their policy position and is presumptuous in including proposals for new railway stations.

Fife Council is undertaking an appraisal of the Local Development Plan (Local Development Plan) land allocations and Transport Scotland welcomed the opportunity to engage in this appraisal process.

To date, Fife Council has not completed appraisal and modelling therefore Transport Scotland does not have sufficient information for a full view on the potential impacts on the trunk road network, particularly with regard to the M90 (T) and M90 Junction 3 Halbeath. Given the outcomes of this work are not yet available for review, Transport Scotland is not able to support the Local Development Plan spatial strategy at this time. Recommends the Reporter seeks further information on this representation upon commencement of the Local Development Plan Examination.

Figure S3 p11 - The Spatial Strategy Figure-S3 on page 11 Various transport schemes are at varying stages of delivery. However all of the schemes are similarly depicted with no differentiation as to their current status, or to the level of commitment to funding or delivery. This may confuse the reader conveying the message that all schemes have the same status and commitment.
In relation to the schemes included on Figure S3 page 11, none are included within Strategic Transport Projects Review with the exception of the A92 upgrades.

To conclude: agreement has not been reached with Transport Scotland on the inclusion of the following schemes within the plan; new rail halt at Wormit (WOR 006) or Newburgh (NEB 004); the inclusion of the re-opening of the Leven rail link to passenger services (LEV 005); or the Dunfermline/Alloa passenger rail link (DUN 066).

An appropriate appraisal has not been undertaken for the A92 upgrades, Wormit rail halt or Thornton – Leven rail link and Transport Scotland is not satisfied that the outputs of current studies relating to the Newburgh rail halt and Dunfermline/Alloa passenger rail link successfully conclude that these schemes are a viable and deliverable transport option at these locations.

Scottish Environment Protection Agency (3296) (3300) Paragraph 3: We support that the “plan strategy combines growth ambitions with improving Fife as a place to live and work in – keeping safe our rich environmental assets an improving and protecting the quality of our towns and villages as they change”.

Figure S2: We welcome that the ‘River Basin Management Plan’ and ‘Flood Management Plan’ have been used to inform the land use strategy.

Welcome the recognition in paragraph 28 that ‘prime agricultural land and food security is a continued concern and in assessing development sites for this plan, the Council has sought to minimise irreversible development in these areas and provide policy protection’.

Scottish Enterprise (1013) In its previous response, Scottish Enterprise stated that the Main Issues Report lost clarity in relation to strategic allocations in the spatial strategy sections, and suggested that a Strategic Development Map should be provided. Scottish Enterprise considers that the Proposed Local Development Plan provides a clear Strategic Development Strategy and Spatial Strategy [Figures S1 and S3 respectively], which identify important and strategic employment and economic development initiatives. Scottish Enterprise welcomes and supports this approach.

Scottish Enterprise also supports the intentions to drive forward the Fife Energy Corridor - Methil to Longannet (see Scottish Enterprise Representation 3). Scottish Enterprise considers, however, that the Energy Corridor could be illustrated more clearly on Figure S3, possibly using alternative annotation.

Scottish Enterprise notes that there is no reference in the Proposed Local Development Plan to the priority to be given to any particular employment / renewable energy site or allocation in relation to the use of scarce resources for investment and / or infrastructure provision. Although cross reference is made to the Planning Obligations Supplementary Guidance, there is little guidance within that document to the means within which sites will be brought forward / scarce resources used.

Paragraph 1 of the spatial strategy expresses support for the creation of a place in which by 2026, economic activity has recovered and building is at a higher level of activity than at present resulting in sustainable economic growth. Paragraph 2 suggests this will be achieved by allocating land for new homes to be built and for investment in economic growth and regeneration. Stewart Milne Homes completely supports these high level
aspirations, but does not consider that the plan’s allocations will deliver the desired increase in the delivery of required homes.

Taylor Wimpey (876) Taylor Wimpey welcome and support the Spatial Strategy being promoted within FIFEplan insofar as it affords support for residential development on the southern edge of Kingseat.

Dave Wardrope (654) That is fine as far as it goes but housebuilders have to develop the land for which they have consent. Landbanking for commercial reasons is outwith the scope of the planning system.

SEStran (710) SEStran welcomes the approach to spatial strategy and strongly supports the sentiment of para 7 of the Proposed Plan.

It is noted that the transport requirements, where included with the settlement plans are generally very localised. It is understood that more strategic requirements are discussed in the Planning Obligations supplementary guidance (see below).

SEStran regrets the apparent absence of an overall transport appraisal for the Plan, even if this simply referred to previous Strategic Development Plan transport appraisals and identified how the Plan as set out related to these in transport terms. It appears that transportation work has been done in preparing the Supplementary Guidance on Planning Obligations and this is discussed further below.

The transport interventions included in the Plan appear to be generally consistent with Strategic Development Plan and Regional Transport Strategy policies and proposals but a few additions would bring extra clarity.

Scottish Natural Heritage (903, 909) The spatial strategy for Fife clearly sets out the Council’s vision for how the area will change in the period to 2026. While the emphasis on economic activity and sustainable economic growth accords with national policy, such as the principles for development set out in NPF3 and SPP 2014, other elements of Scottish Government’s vision for Scotland are less clearly stated. Given Fife’s position within two Strategic Development Plan areas which have differing visions, we suggest that the Proposed Plan should take the opportunity to clearly set out the Council’s overall vision for development in Fife.

Our understanding of the content of the Plan indicates that the natural heritage has been well integrated into the Plan and the requirements it sets for individual development sites.

The strategy for rural areas includes a second statement on the value and importance of the natural heritage of Fife. Coast and countryside are identified as assets in paragraph 26 (error in representation as indicated in para 29) and similar approach would be welcomed in paragraph 28 which highlights the importance of managing the impact of development on the environment.

Professor Max Taylor (1770) I find this a very disappointing plan. It embodies rather than challenges much of the worst characteristics of recent planning initiatives, by failing to offer an adequate evidence base for proposals, making unsupported and often implicit assumptions on which strategies are premised, and perhaps most important of all, failing to offer any meaningful analysis of the social and community consequences of the
proposals. Fife is made up of communities which have rich histories, varied economic potential, and thriving community organisations. Many of these proposals, if implemented, will at a local level radically change these communities. Some of those changes may be positive, others negative; but there is no effort made to appreciate or evidentially explore what those effects might be at a local level. It may be that not exploring local consequences is the intention behind this document - certainly recent experience in North Fife suggests that local decision making is largely abrogated by the planning process, thus emasculating local communities, something to which this planning process will no doubt contribute to. But this will not contribute to social justice, nor to the development of vibrant healthy communities.

Stewart Milne Homes (1821, 1822), Landvest PCC Ltd (1870), J G Lang & Son (2172), Linlathen Developments (Tayside Limited) (2116), Hallam Land Management (2985) Stewart Milne Homes completely supports these high level aspirations, but does not consider that the plans allocations will deliver the desired increase in the delivery of required homes. They support the Homes for Scotland comments on the strategy. The strategy is not adequate in the following ways:

- Improved living standards cannot be achieved due to a lack of housing land.
- Puts a restraint on the most marketable areas, particularly NE Fife;
- The strategy does not take into account deliverability;
- No clear expression of strategy;
- Is not clear on when sites will be delivered.

Homes for Scotland (1828) Supports general aims of strategy but thinks it is not well presented and that it will not be achieved due to lack of housing and restrictions put on certain markets, particularly North East Fife. Does not like the presentation of settlement tables as it is hard to identify new sites.

Alfred Stewart Property Foundation (1939) Spatial strategy does not conform with the requirements of TAYplan and SESplan as is required under legislation.

Royal London Asset Management (2004) There is a substantial amount of new housing proposed in the LDP and in particular a new strategic allocation has been included to the north of Dunfermline. This allocation requires a large amount of new infrastructure and support services. It is therefore inevitable that with the amount of new housing proposed in the period of the LDP up to 2026 a substantial amount of new retail development should also be planned to support this massive amount of new housebuilding.

Unlike the previous Fife Structure Plan in which there was positive planning for new floorspace and an acceptance that planning policy should be geared towards ensuring that Fife becomes more sustainable in respect of retail and other services in retaining as much trade as possible locally, SESPlan and the LDP are silent on the issue of retail leakage to Edinburgh in particular.

I Spowart (2050), Gladman Developments (2771) Support for general aims of strategy but it must be backed up with suitable levels of housing land.

Stirling Developments (2031) Support for the focus on high quality design and to focusing housing and employment in close vicinity to encourage sustainable travel patterns.
A and J Stephen (2152) Concern about the ability to deliver the SESplan part of the strategy. Also support for Homes for Scotland representation. Believes that the TAYplan strategy is overly reliant on large SDAs and will also struggle to be delivered.

Scottish Water (2311) Have worked closely with Fife Council and support the strategy of the Local Development Plan.

Dr Allen Armstrong (2024) Strategy does not have enough focus on addressing retail leakage and does not address the support facilities that communities will need. Also some of the geographic headings used are illogical.

Dr Allen Armstrong (2193) Support for Fife Energy Corridor concept but highlights that care should be taken not to damage more natural coastal areas.

Douglas Lawrence (2350) Too much focus on car ownership and associated land to provide for car usage.

Hazel McIntosh (2505) Object to the spatial plan as the countryside should stay as it is.

Greg McShane (2717) High quality agricultural land should be protected from development, all development should be on brownfield sites and the Local Development Plan should address long term issues such as global warming.

Patricia Brown (3898) Object to Fife Council proposals to build on green belt land. The environment matters.

Gladman Developments (2761) Gladman supports the overall spatial strategy for Fife and is pleased to see explicit recognition of the importance of house-building for achieving economic growth and social improvement.

**Modifications sought by those submitting representations:**

Rose Dorman (1445) reject whole plan due to environmental and social impacts.

Glenrothes Area Futures Group (1326) Clarify role of Dunfermline, Glenrothes and Kirkcaldy Town Centres.

Stirling Developments (3678), Taylor Wimpey (876), Dave Wardrope (654), Prof Max Taylor (1770), I Spowart (2050), Stirling Developments (2031), Scottish Water (2311), Dr Allen Armstrong (2193), Hazel McIntosh (2505), Gladman Developments (2761, 2771) No modifications sought or mentioned

Kirsteen Shaw (3916) Further assessment of transport and environmental impacts required.

Taylor Wimpey (3691), Lynch Homes (3709), Avant homes (3695) Remove references to Plan end date of 2026 and change to 2024.

Transport Scotland (3216) The following changes to Figure S3 are recommended;

- The word “Potential” should be included before the A92 Upgrades.
**Proposed Fife Local Development Plan**

- Reference to Wormit and Newburgh rail stations should be removed.
- Reference to the Leven rail link should be removed.
- Reference to Dunfermline/Alloa passenger rail link should be removed.

**SEPA (3296, 3300)** Supports the Strategy on environmental assets and that River Basin Management and Flood Management Plans have been used to inform the land use strategy. Welcome that the Council has sought to minimise irreversible development on prime agricultural land through site assessment and policy protection.

**Scottish Enterprise (1013)** Scottish Enterprise requests that further consideration be given to identifying the status and/or priority for infrastructure investment to bring forward allocations (particularly strategic employment and infrastructure provision but housing land also) and also requests that further clarity be given towards establishing various funding mechanisms to unlock the development potential of employment sites.

**SEStran (710)** SEStran have the following specific comments in relation to transport proposals:

- Design of new road links and road or junction capacity enhancements should always include consideration of priority for public transport and improvement of walking and cycling facilities. This is relevant throughout the Plan area, but is particularly important in the Dunfermline Area strategy, the A92 corridor around Glenrothes and the Kirkcaldy area.
- The Tay Bridgehead area strategy (para 59) could mention the proposed Park and Ride site at this location (it is included on the proposals map).
- Reference to safeguarding the rail link into Rosyth port should be strengthened by inclusion as a separate item, rather than just mentioning it in the context of the Container Terminal proposal (Ref ROS 013).

**SNH (903, 909)** Include a vision in the plan, more reference to the need for environmental protection and change colouring of map as it is difficult to read. Include reference to coast and countryside, in terms of specific environmental assets to be protected, in paragraph 28.

**Royal London Asset Management (2004)** The overall spatial strategy should acknowledge the overall retail needs of new communities and also reference the council's own Retail Capacity Study which should also be updated to take account of new housebuilding targets, particularly in West Fife.

**Stewart Milne Homes (1821, 1822), Landvest PCC Ltd (1870), J G Lang & Son (2172), Linlathen Developments (Tayside) Limited (2116)** Inclusion of a traffic light system such as deployed in Aberdeenshire where material issues are highlighted and a weighting put on their likely chances of timeous implementation would be a useful guide in this respect and will help inform the housing land audit which of course is the annual monitor of housing land supply delivery or otherwise.

Also addition of further housing sites to allow strategy to be realised and the removal of restrictions in some areas to allow the market to deliver housing.

**Homes for Scotland (1828)** Improve clarity of vision, add more housing land and remove restrictions from North East Fife to allow the market more land. Inclusion of list of new housing sites to distinguish from those being carried forward from existing Local Plans.
Alfred Stewart Property Foundation (1939), A and J Stephen (2152): Add additional housing land to allow the spatial strategy to be realised.

Dr Allen Armstrong (2024) Spatial strategy should acknowledge the retail needs of the communities, particularly in West Fife.

Douglas Lawrence (2350) Introduce no car areas for those without vehicles.

Greg McShane (2717) Focus all development of brownfield land and protect agricultural land.

Hallam Land Management (2985) Addition of further housing sites to allow strategy to be realised and the removal of restrictions in some areas to allow the market to deliver housing.

Patricia Brown (3898) Delete proposals on green belt land from the Proposed Local Development Plan.

**Summary of responses (including reasons) by planning authority:**

**Overall response**

TAYplan and SESplan both provide a context through which the focus of land use change should be managed. The development of the spatial strategy required the amalgamation of the spatial strategies in TAYplan and SESplan. These strategies are compatible but are presented in a slightly different manner. Both focus on the ability of settlements to accommodate future change and encourage Local Development Plans to further assess opportunities based on a wide range of sustainable principles.

The basis of the Local Development Plan strategy is the existing Strategic Development Areas (SDAs). These SDAs and other sites have been previously committed and tested through the development planning process. This has led to substantial support for the strategies being pursued among communities, local politicians, infrastructure providers and many parts of the development sector. The vast majority of sites identified through this process still represent the best strategy for the continuing delivery of the housing requirements of the area.

As such, there is a presumption that existing development allocations currently included in the Fife development plan will continue and are subsumed within the new Local Development Plan. Monitoring of the SDAs’ progress will continue through this Plan period and consideration will be given to the need for a review in time for the Local Development Plan review.

For new sites, the Local Development Plan strategy is to use the spatial direction of the two SDPs and firstly looks to allocate sites for development within existing settlements. There are not sufficient viable opportunities for development land within towns and the remainder of the sites require to be found on the edge of town boundaries. Proximity to services, compatibility with the form of towns, environmental impact and access are key issues that determine the suitability of sites. Development opportunities have been identified within town centres to contribute to meeting the demand for development.
In TAYplan the strategy focuses on identifying smaller sites in the smaller villages to complement but not compete with the existing SDAs in Cupar and St Andrews. SESplan requires the addition of large amounts of development land but this was identified using the same method as TAYplan. The strategy looks to focus edge of settlement strategic development towards the western and eastern ends of the Ore/Upper Leven Valley area and particularly on the towns of Cowdenbeath, Kelty and Glenrothes Town and also to North Dunfermline. This makes best use of sustainable locations, land availability, existing infrastructure and also focuses on areas which are national and regional priorities for development and environmental improvement. They also provide good opportunities for linking into the strategic green network. This best complements the existing development strategy and this strategy is developed further later in this document.

A transport assessment (Core Document 19) has been undertaken, in consultation with Transport Scotland, and this has confirmed that the transport infrastructure that is identified in the Plan is sufficient to accommodate the levels of development proposed through the strategy.

Rose Dorman (1445) The aim of the plan is to provide the context for sustainable development to take place that meets the needs of the area. There will be impacts of this new development but the impacts have been assessed and measures to mitigate against potential negative impacts are identified in the Plan. If the plan was not prepared or rejected in its entirety then development would still take place, just in a more haphazard way and one that would potentially lead to more negative impacts. The potential impact of hazardous substances is an important consideration when considering development proposals. Fife Council believes that the impacts on the environment, including air quality, and the amenity of the local population are covered by policies in the Local Development Plan. No change needed.

Glenrothes Area Futures Group (1326) These three town centres are strategic centres, as is identified in SESplan and for Glenrothes referenced on page 15 paragraph 42 of FIFEplan. Their scale is shown on Figure 6.1. They are highlighted as key town centres and have associated frameworks. Glenrothes’ importance as a strategic town centre is recognised in the Plan. The Council will be proactive in aiming to secure development opportunities to improve the range of leisure and retail facilities in the town centre.

Stirling Developments (3678, 2031), SEPA (3296) (3300), Taylor Wimpey (876), Scottish Water (2311), Gladman Developments (2761) Support noted and welcomed.

Kirsteen Shaw (3916) The environmental impacts of the plans have been assessed through the Strategic Environmental Assessment Process and the site assessments. A transport assessment is being undertaken, in conjunction with Transport Scotland to ascertain the impacts on the road networks and any infrastructure required will be factored into the Local Development Plan. No change needed as both areas are already being assessed.

Taylor Wimpey (3691), Lynch Homes (3709), Avant homes (3695) Scottish Planning Policy states that Local Development Plans should provide housing land for a period for 10 years from the expected date of adoption of the plan. The Local Development Plan does this by including a timeframe up to 2026. Neither SESplan nor TAYplan exclude plans from having timeframe going beyond 2024. SESplan states that the distribution of allocations beyond 2024 generally Therefore there is no conflict with the
Local Development Plan or the Strategic Development Plans and no change is required. Transport Scotland (3216) The assessment of the impacts on the trunk road is ongoing and will be prepared for the examination. Fife Council welcomes the assistance of Transport Scotland in progressing this analysis and will add any further interventions, highlighted through the modelling, to the Local Development Plan.

In relation to Transportation Proposals LEV 005 & LEV 008, Fife Council acknowledges the comments made by Transport Scotland regarding proposals at Newburgh, Wormit and Dunfermline/Alloa but wishes to retain the proposals within FIFEplan as these represent the aspiration of the Council to improve the strategic transport links that underpin the local economy. The Council is committed to improving the strategic and local transport links that underpin Fife’s local economy. Work and will work with Transport Scotland to make the case for the Levenmouth Rail Link (see supporting documents 7 and 8 under Issue 14).

The justification for the Council to include the Levenmouth rail link as an aspirational project in the Local Development Plan is confirmed by the response from Derek Mackay to Council Leader, Cllr David Ross, dated 4th May 2015. In this the Minister states that ‘Although this project [Levenmouth Rail Link] was not progressed as part of the Strategic Transport projects Review (STPR), the Scottish Government is willing to consider proposals for new services where a clear rationale has emerged from a Scottish Transport Appraisal Guidance (STAG) appraisal and where viability has been established through a detailed consideration, subject to affordability and other competing priorities’ (see Supporting Document 1).

Fife Council is happy to carry out the assessment of impacts of the trunk road network as mentioned above. However the requirements of Development Planning and Management Transport Appraisal Guidance (DPMTaG), mentioned in the response to the Local Development Plan, are complexed. They require plans to carry out excessive modelling at considerable cost prior to inclusion in the Local Development Plan with no guarantee of support at a national or regional level. It also gives the appearance that transport infrastructure assessment is guiding the whole strategy of the plan.

Transport strategy is an integral part of the development plan but needs to be realistic over what can be delivered. It is reasonable to identify future strategic transport needs to implement the plan strategy although recognising that public funding may not be committed at this stage.

While not seen as essential, the addition of the word ‘potential’ ahead of A92 upgrades would clarify the text and the status of this piece of infrastructure. Therefore, Fife Council considers that there is merit in the proposed wording put forward by Transport Scotland to be included within the Development Requirements for this proposal and invites the Reporter to make an appropriate recommendation on this issue.

Scottish Enterprise (1013) While the delivery of the employment sites along the energy corridor is an important part of the strategy it is beyond the remit of the plan to provide a prioritisation strategy for their delivery. The plan identifies the sites and protects the land and it is the job of the Fife Employment Land Strategy, which the Local Development Plan is cross-referenced to, to set out how it will be delivered. The plan does provide mechanisms that will assist the funding of employment land. No change required.

Dave Wardrope (654) Agree that this is a key issue that will determine the success or
otherwise of the plan strategy. The non-delivery of the development industry is the key issue that is creating a housing shortfall and this issue is addressed further in the housing supporting paper.

SEStran (710) Welcomes support for spatial strategy and confirms that transport assessment work is ongoing that will identify the impact of the strategy on the trunk road network.

The issue about the provision of public transport, walking routes and cycling is covered under Policy 1 and 3.

Agree that the following wording can be added to provide greater clarity:

- The Tay Bridgehead area strategy (para 59) could mention the proposed Park and Ride site at this location as it is included on the proposals map.
- Reference to safeguarding the rail link into Rosyth port should be strengthened by inclusion as a separate item, rather than just mentioning it in the context of the Container Terminal proposal (Ref ROS 013).

SNH (903, 909) A vision is not a requirement of Local Development Plans in City Regions but the Proposed Local Development Plan does set out a Fife-wide strategy that bridges the two Strategic Development Plan visions to implement their strategies.

Page 9 of the plan mentions the need to protect the rich environmental assets of the area. This theme is covered in more detail through the sub-regional strategies and settlement tables. We do not believe that there is a bias in the wording towards economic development.

The style of the strategy diagram was the result of a public consultation. However changes to the colours will be investigated for the final version of the plan to make it easier to read. The plan will mainly be viewed online so the issue should become less noticeable. No change required through examination.

It is considered that the wording in paragraph 26 referring to ‘coast and countryside’ and in paragraph 28 referring to ‘natural assets’ is complementary and sufficient to highlight the protection of the environment within the overall spatial strategy. Policies in the Proposed Plan will ensure the detailed protection of these assets.

Prof Max Taylor (1770) There is no doubt that significant changes will occur to many communities if the strategy of the plan is realised. The impact on the character of these communities is of key concern and the management of impacts is essential to the successful delivery of the plan outcomes.

Infrastructure needs such as roads and school as identified in the plan as well as environmental mitigation or enhancement opportunities. Alongside the plan the Council is pursuing the publication of clearer guidance on place making which highlights the key elements that need to be incorporated into new development. The key will be in implementation but the plan provides a strong context for allocations to be considered and consultation to take place with local communities. No change required.

Stewart Milne Homes (1821, 1822), Landvest PCC Ltd (1870), J G Lang & Son (2172), Linlathen Developments (Tayside) Limited (2116) The response rightly identifies the
need to have a degree of certainty that sites will be delivered. This is currently done through the housing land audit and the action programme. A traffic light system would quickly get out of date as the effectiveness of sites can change on a year-by-year basis. It could be updated annually but this would really replicate the role currently performed by the Housing Land Audit which annually makes a judgement on the effectiveness and expected delivery of sites. Therefore there is limited benefit in introducing a traffic light system to the Local Development Plan as it would not provide any more information than the Housing Land Audit which is currently carried out. No change required but the traffic light approach for monitoring purposes will be looked at further for application in the Action Programme.

The issues around the level of housing are covered in Schedule 2b on Homes and in the Housing Supporting Paper. However there is no restraint on housing in the TAYplan area. The Local Development Plan identifies more than enough housing land and contains a positive strategy for housing delivery.

Homes for Scotland (1828), A and J Stephen (2152), Hallam Land Management (2985)

The support for the overall aims of the strategy is welcomed. Fife Council does not believe that there are unrealistic restrictions on housing development placed on any part of Fife by the Local Development Plan. In some areas no new allocations have been made. However, the perception that there is a restriction on housing land comes from a skewed perspective presented in the representations which sees many of the sites carried forward from the Local Plans to the Local Development Plan as being non effective.

The continued support for large sites that are now beginning to progress is important as it provides the continuity needed by communities, infrastructure providers and developers.

Some parts of Fife do not have new housing allocations. This may be because of a lack of suitable new development options being submitted as part of the Local Development Plan process or due to there being existing allocations which provide sufficient opportunities for housing development in a given town over the lifetime of the Local Development Plan.

Sites carried forward from Local Plans and new allocations, together make up an element of the strategy of the Local Development Plan. Fife Council does not think it would be appropriate to simply include a list of new housing sites as, in the eyes of the Local Development Plan; all effective housing sites are the same. Through the LDP process we have aimed to simplify annotation on the proposals maps and to introduce another category of housing site would not be in line with this approach but will review future versions of the Plan to distinguish which proposals are new from those carried forward from the previous Local Development Plan.

The strategy is challenging but achievable. The ability to achieve it will not be assisted by adding more land for housing. The challenges in achieving the strategy is the delivery of high quality places and the associated infrastructure, not a simple arithmetic calculation and the subsequent addition of more housing land as is presented in this representation. Adding more housing land will make no difference to the delivery of the strategy. Therefore no changes are required.

The issues around the level of housing are covered in Schedule 2b on Homes and in the
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Housing Supporting Paper. However there is no restraint on housing in the TAYplan area. The Local Development Plan identifies sufficient land for housing.

Alfred Stewart Property Foundation (1939), I Spowart (2050), Gladman Developments (2771) The success of the strategy is not dependent on adding land for another 8,000 more houses. This will not aid the delivery of the strategy, especially as the majority of this additional housing would not be delivered due to the lack of capacity in the market or need in the community. If anything it may hinder the strategy as it may distract attention away from the delivery of existing sites where there are already co-ordinated approaches to the delivery of infrastructure and housing. The issues around the level of housing are covered in Schedule 2b on Homes and in the Housing Supporting Paper. However there is no restraint on housing in the TAYplan area. The Local Development Plan identifies more than enough housing and if any restraint does exist then it is coming from elsewhere.

Royal London Asset Management (2004) The retail capacity study will continue to be updated annually and factor in proposed new development as outlined in the housing land audit. Fife Council is not against retail growth but it does aim to put town centres first. The scale of proposed development will be assessed against the retail capacity study alongside the sequential test. While we will aim to reduce leakage this will be done within the context of the role Fife towns play in the wider SESplan and TAYplan regions. The presence of retail leakage does not automatically equate to a desire to allow further retail development. While it is important that Fife’s town centres have a range of retail facilities to attract the local and wider population it has to be accepted that there will always be some leakage outwith Fife given the scale of Dundee and Edinburgh and their regional roles.

Dr Allen Armstrong (2024) The plan does cater for the needs communities and includes examples when retail opportunities have been identified.

The Local Development Plan caters for retail needs by promoting a strong town centres first policy approach. It does not have the same approach as the Structure Plan but in a similar vein supports the areas town centres and identifies several sites across a number of town centres where retail can be accommodated. The plan must reflect its role as part of the wider city region and that there is inevitably a degree of leakage to the bigger centres or Edinburgh and Dundee.

If new retail proposals, unidentified in the plan, do come forward, as long as they can be justified against Policy 1 and 6 then there will be scope for further retail development. No change needed.

Dr Allen Armstrong (2193) Support for the energy corridor is welcomed. The point about protecting the natural attributes of this area is a valid issue and will be addressed when individual proposals are being implemented or considered.

Douglas Lawrence (2350) The needs of all should be considered when planning new development and they should not be dominated by the car. Car parking should not be the prominent feature and the development should allow the safe movement of people and vehicles. But, in general, a large proportion of the population owns cars and this must be catered for in new development, otherwise it would push the parking issue onto adjoining areas. However, opportunities will be looked into in more urban areas for area with lower parking provision. No change needed.
Hazel McIntosh (2505) The Council recognises that the countryside is important but needs to balance that with other planning considerations. Development is, therefore, required on some greenfield areas but the plan sets a strong framework to ensure that developments are of high quality and provide green network enhancements for the benefit of the community and natural world. In some instances this may make the landscape and biodiversity better due to the current degradation of edge of town areas.

Greg McShane (2717) The levels of development required, particularly housing, require that some development needs to go on greenfield sites. Through the site assessment process we have aimed to avoid the highest quality agricultural land. The strategy also looks to locate development as close as possible to the centres of town and with good access to services. This should encourage more carbon friendly patterns of movement.

The points raised about having a long term strategy and a high quality development are valid and will be pursued through planning allocations.

Patricia Brown (3898) The two designated Green Belts in Fife, for Dunfermline and St. Andrews, are largely unchanged, in the Proposed Local Development Plan, in terms of their original boundaries as identified in the Adopted Dunfermline & West Fife Local Plan and St. Andrews & East Fife Local Plan. The Dunfermline Green Belt has been slightly extended in the area of Berrylaw. The St. Andrews Green Belt has been reduced through the Fife Council and Scottish Government approval of the new Madras School site at Pipeland. There are no further proposals for development identified within Green Belt. Any future planning applications submitted in the Green Belt would be considered against the provisions of Policy 9 ‘Green Belt’. Issues relating to the policy are addressed under Issue 2F: Countryside.

The respondents may have intended their reference to Green Belt to have meant ‘greenfield’. In this case, the levels of development required, particularly housing, require that some development needs to go on greenfield land. Through the site assessment process we have aimed to minimise the use of the highest quality agricultural land. The strategy also looks to locate development as close as possible to the centres of town and with good access to services. This should encourage more carbon friendly patterns of movement and protection of the environment.

**Reporter’s conclusions:**

**Fife Spatial Strategy**

1. The spatial strategy of the proposed plan outlines what FIFEplan is intended to achieve over the 10-year period from its adoption. The strategy carries forward proposals from the previous local plans which it will replace, the Dunfermline and West Fife Local Plan (2012); the Mid Fife Local Plan (2012) and the St Andrews and East Fife Local Plan (2012) and is framed by national policy and the 2 strategic development plans, SESplan (2013) and TAYplan (2012).

2. I note that the spatial strategy is intended to support the creation of a place, in which by 2026, economic activity has recovered and building is at a higher level of activity than present resulting in sustainable economic growth. The council considers that this will be achieved by allocating land for new homes to be built and by investment in economic growth and regeneration and that the proposed plan policies will encourage new, high
quality development to achieve these outcomes. The spatial strategy has been developed by the council in order to combine these growth ambitions with improving Fife as a place to live and work, keeping environmental assets safe and improving and protecting the quality of towns and villages as they change.

3. The council states that the strategy is based on the existing Strategic Development Areas (SDAs). In the TAYplan area, it focuses on identifying smaller sites in villages which would complement and not compete with the Cupar and St Andrews SDAs. In the SESplan area the strategy directs edge of settlement strategic development towards the western and eastern ends of the Ore/Upper Leven Valley area particularly Cowdenbeath, Kelty and Glenrothes Town and North Dunfermline. I recognise that, in line with Scottish Planning Policy, the spatial strategy within Fifeplan seeks to direct the right development to the right place to promote a sustainable pattern of development appropriate to the area.

4. The area strategies set out on pages 14 to 17 of the proposed plan together with Figure S3 provide a clear, if concise, spatial strategy for each area of Fife and for Fife as a whole. The settlements to which development will be directed are identified and justification for the approach provided. I do not consider that further explanation is necessary.

Overall Environmental Impact

5. I acknowledge that the level of development proposed in FIFEplan will inevitably have environmental impacts. However, these impacts have been assessed by the council during the preparation of the proposed plan in various ways including settlement assessments (see the Spatial Strategy Technical Paper), site assessments, a Strategic Transport Assessment (agreed with Transport Scotland) and the Strategic Environmental Assessment of both proposals and policies. Habitats Regulations Appraisals, to consider the impact of policies and proposals on nature conservation sites and an equality impact assessment to address the potential impacts of the policies and proposals on different sections of the community were also undertaken. The strategy of the proposed plan seeks to focus housing development on towns and villages having regard to the range of facilities, local need and likely impact on their location. The council has confirmed that the 2 designated green belts for Dunfermline and St Andrews are largely unchanged in the proposed plan (see also Issue 16 where it is recommended that site STA 013 - Pipeland Farm, St Andrews, should be deleted and reinstated as green belt.). Measures to mitigate against the possible negative impacts of proposals have been identified in the settlement plans for each town and village that has proposals. The settlement plans also set out the range, type and scale of development which the council will support.

6. Policy 3 (Infrastructure and services) states that development must be designed and implemented so it delivers the required level of infrastructure and functions in a sustainable manner. Policy 4 (Planning obligations) requires developer contributions, including transportation contributions, from development if it will have an adverse impact on infrastructure capacity. The aim of the policy is to ensure that new development will not have a net detrimental effect on existing infrastructure and the local environment. Policy 13 (Natural environment) and access seeks to maintain and enhance Fife’s environmental assets. Furthermore, under Policy 10 (Amenity) development will only be supported if it does not have a significant detrimental impact on the amenity of existing or proposed land uses in relation to, among other things, air quality, contaminated and
unstable land and noise, light and odour pollution. This policy seeks to ensure that existing uses and the quality of life of those in the local area are not adversely affected by development and would be applied to any planning application for hazardous materials.

7. Reference to a low carbon Fife and the Climate Change (Scotland) Act 2009 target of reducing greenhouse gas emissions is made on page 231 of the proposed plan. Policy 11 (Low Carbon Fife) seeks to encourage sustainable buildings and low carbon energy schemes. In paragraph 28 of the proposed plan the council states that prime agricultural land and food security is a continued concern and in assessing development sites for this plan, the council has sought to minimise irreversible development in these areas and provided policy protection.

8. In order to conform with both national and strategic planning policy and guidance, a certain level of development in the area is unavoidable and some of it will require to be located in greenfield, countryside locations which may involve development of some high quality agricultural land. Nevertheless, given the assessment work carried out in the preparation of FIFEplan and through the implementation of the policy framework contained within it, I am satisfied that the resultant environmental impacts should not be unacceptable. The next review of the local development plan and its monitoring statement will provide the opportunity to review the impacts of the plan’s policies and proposals.

Status of Dunfermline, Glenrothes, Kirkcaldy and Levenmouth

9. Dunfermline, Glenrothes and Kirkcaldy are all similarly identified in figure S3 – Spatial Strategy of the proposed plan and area strategies are set out for each of these areas on pages 14 to 15. Paragraph 42 recognises Glenrothes town centre as a strategic town centre. The representation has not directed me to instances where these centres are not treated equally. I do not consider that additional references to their equal status would be helpful.

10. The Kirkcaldy, Glenrothes and Central Fife area refers to the housing market area context. The area strategies for Fife on pages 14 to 17 of the proposed plan include a separate area strategy for Glenrothes, Kirkcaldy and Levenmouth recognising the status of Levenmouth as a main focus for development in the area. The Levenmouth Strategic Development Area is also clearly marked on figure S3 – Spatial Strategy separately from Glenrothes and Kirkcaldy. I do not, therefore, agree that the proposed plan excludes reference to Levenmouth. No change to the proposed plan is required.

Housing

11. Matters with regard to the following are considered under Issue 2b (Homes):

- The housing land requirement
- A generous supply of effective housing land
- The delivery of the development industry
- The end date of the proposed plan

12. I do not accept that the strategy of the proposed plan unnecessarily restricts development in any one area of Fife. The strategy reflects the strategies of both
SESplan and TAYplan and concentrates development on the existing SDAs including the Ore/Upper Leven Valley. Housing development elsewhere is located so as not to compete with these strategic sites. Many representations argue that the SDAs are undeliverable. Detailed arguments with regard to their effectiveness/deliverability are dealt with in the individual issues which deal with these specific areas elsewhere in this report.

13. Figures 6.1 and 6.2 of the council’s Supporting Housing Paper show a broad distribution of housing sites across the SESplan area. The proposed plan identifies sufficient housing land to more than satisfy the housing requirement for the TAYplan area and I am not persuaded that the strategy has resulted in the unwarranted restraint of housing development in the north-east area of Fife. The 2015 Housing Land Audit has been agreed with Homes for Scotland (subject to 4 sites in dispute). The identification of the sites included in the housing land audit as effective, including sites carried over from the existing local plans is therefore justified. Overall, I am satisfied that a broad range and choice of sites have been provided and subject to my conclusions under Issue 2b (Homes) about housing supply, I regard the strategy as appropriate.

14. I agree with the council that the vehicles for assessing the delivery of housing sites are through the annual housing land audit and the action programme. I note that the council has agreed to look at the use of a traffic light system as part of the application of the action programme. The preparation/application of the action programme is outside my remit and I do not consider that any changes to the proposed plan are necessary.

15. Turning to the settlement tables, while I find their content and layout useful, I accept that the identification of new sites allocated in the local development plan is not readily apparent. I consider that this could be easily achieved by adding an asterisk after the reference for each “new” site with an appropriate explanation included in the settlement plan introduction. Similarly an asterisk could be added after the relevant site notation on the proposals map. I find that this would add to the clarity and help the interpretation of the plan as a whole.

16. I note the reference to land-banking for commercial reasons but as acknowledged in the representation, this is outwith the control of the planning system.

17. Matters with regard to planning obligations are dealt with in Issue 2c.

Transport

18. As recommended by Transport Scotland, I requested further information when the examination commenced. Following my further information request FIR 04, Transport Scotland has confirmed that it has undertaken continued dialogue with the council and their consultants on the Transport Appraisal and associated modelling of the proposed plan allocations since representations were submitted. As a consequence, Transport Scotland is now satisfied that the transport infrastructure identified in the proposed plan is sufficient to accommodate the level of development proposed within the spatial strategy. No changes to the proposed plan are required.

19. I note that Transport Scotland currently has no plans to fund or deliver potential upgrades to the A92 trunk road. I therefore agree that it would be appropriate to insert the word “potential” before its notation in figure S3 – Spatial Strategy and the title for GLE 036 in the settlement plan, in order to clarify the status of this route upgrade. See
also Issue 10 which deals with matters relating to GLE 036.

20. The new rail stations at Wormit (WOR 006) and Newburgh (NEB 004), the Thornton-Leven rail link (LEV 005)/Bawbee Bridge safeguarded rail halt (LEV008) and the Dunfermline/Alloa passenger rail link (DUN 066) are dealt with under Issues 20, 19, 14 and 7a1 respectively. It is recommended that all of these transport schemes should remain in the plan. The 2 rail links are to be identified as safeguarded routes and the rail stations as safeguarded rail halts with additional supporting text to make it clear that none of the schemes are currently supported by Transport Scotland. Figure S3 should be amended accordingly. This will differentiate between the scheme’s differing status and level of commitment to funding/delivery without removing them from the plan entirely.

21. I agree that, for clarity, the Tay Bridgehead area strategy should include reference to the proposed park and ride site as it is identified on the proposals map. I also see merit in strengthening the reference to safeguarding the rail link into Rosyth Port to reflect the importance of the Rosyth rail link to serve additional freight facilities on the Forth. This is highlighted in National Planning Framework 3 (NPF3). The proposed plan should be amended to include the additional supporting text at paragraphs 16, 15 and under proposal ROS013 (Rosyth International Container Terminal) as suggested by the council in their response to further information request FIR 107. Given the close association with the container terminal and subject to the above additions to the text of the proposed plan, I do not consider that a separate proposal for the rail link is required.

22. I note the concern expressed about too much focus on car ownership and land for car usage and the reference to the need for residential areas zoned for non-owners of vehicles. The council responds to say that the needs of all should be considered when planning new development and opportunities will be looked into in more urban areas for areas with lower parking provision. Policy 14 (Built and historic environment) states that the council will apply the six qualities of successful places when considering development proposals. One of these qualities is “easy to move around and beyond.” This is described at paragraph 2 on page 244 as street design that considers all users and is well connected into existing movement networks, putting people and place before vehicular movement. In addition, it is recommended elsewhere in this report, under Issue 2c (Planning obligations), that local transport and safe access routes which link with existing networks “including for walking and cycling” should be added to Policy 3 (Infrastructure and services).

23. Given the high percentage of the population who own cars I do not consider it feasible to direct that areas for non-car owners should be part of every development but part of the street designs encouraged by Policy 14 could include the designation of such areas. Although the proposed plan does not require their provision, it does not preclude their provision, where proposed. I am therefore satisfied that this matter is already dealt with adequately in the proposed plan and no further changes would be appropriate.

24. The comments about the detailed design of new road links and road or junction capacity enhancements are matters of detail which I do not consider need to be included in the proposed plan.

Employment and economic development

25. Scottish Planning Policy sets one of the core values of the planning service as
playing a key role in facilitating sustainable economic growth, particularly the creation of new jobs and the strengthening of economic capacity and resilience in communities (paragraph 4). By allocating sites and creating places that are attractive to growing economic sectors and enabling the delivery of necessary infrastructure, planning can help provide the confidence required to secure private sector investment, thus supporting innovation, creating employment and benefiting related businesses (paragraph 16). Scottish Planning Policy requires spatial strategies within development plans to locate development where investment in growth or improvement would have most benefit for the amenity of local people and the vitality of the local economy (paragraph 40).

26. The Fife Employment Land Strategy has identified sites across Fife for employment investment and these are included in the proposed plan and protected by policy to provide a sufficient land supply in Fife’s key towns. I consider the existing mechanisms to assist the delivery and funding of employment land in Policy 4 (Planning obligations), subject to the changes recommended under Issue 2c, to be appropriate. I find that the employment and economic development strategy of the proposed plan conforms with government guidance and do not consider that the addition of a prioritisation strategy is required.

27. The spatial strategy section of the proposed plan already refers to the National Renewables Infrastructure Plan (NRIP) and I am not persuaded that further emphasis is needed or that the identification of NRIP sites or potential sites is necessary. Finally, I do not regard the notation for the Fife Energy Corridor as unclear. It is illustrated both visually and by a quotation box which I consider to be more than adequate. However, if the council want to reassess how the Energy Corridor is shown in figure S3 – Spatial Strategy, this could be done without my formal recommendation, as a minor modification.

Natural Heritage

28. I find that the spatial strategy for Fife set out in the proposed plan already clearly describes the council’s vision of how Fife will develop, taking into account the 2 Strategic Development Plans for the area. I am not convinced that a separate “vision” would add anything to the proposed plan.

29. I agree that the area strategies are a useful means of representing the varying characteristics of Fife’s main settlements and villages. While a spatial representation of the areas might have been a useful addition, I do not consider that its absence detracts from the understanding of the area strategies to an unacceptable degree.

30. Paragraph 28 also recognises Fife’s rural environmental “assets”. No detail has been provided as to the alternative wording suggested and I regard the existing wording of the section on “Rural Areas” as adequate.

31. Although I do not find figure S3 – Spatial Strategy hard to read, the council has agreed to look at this again when the final version of the plan is produced. Any resultant amendments to the colours could be undertaken without my formal recommendation, as minor modifications.
Retail

32. Under Issue 2e (Town centres) the reporter concludes that the council’s belief that there will be an inevitable element of leakage to Edinburgh and Dundee is a pragmatic outlook in recognition of the regional roles played by these centres. He finds that, all in all, Policy 6 (Town centres first) is not deficient in terms of any spatial planning requirements to address “leakage” and that it provides a reasonable basis for providing a range of retail facilities to meet the forecast demand to 2024. He notes the suggestion that Policy 6 should indicate where growth in retailing and supporting services is to be promoted to support the level of housing development that the proposed plan anticipates but, taking into account the terms of the 2014 Retail Capacity Study, believes the general approach of Policy 6 is sufficiently adaptable to accommodate any demands that residential growth may generate. I concur with his conclusions.

33. I note that the intention of the council is to update their retail capacity study annually and factor in proposed new development included in the housing land audit. This will ensure that the council can take into account up-to-date information when dealing with retail related planning applications. One of the purposes of the studies is to quantify the extent of expenditure leakage from Fife and the 3 sub areas in Fife by retail category and to advise a strategy to reduce retail leakage. I consider this to be an appropriate method to deal with retail leakage and do not consider the omission of any reference to this issue within the spatial strategy of the proposed plan to be unacceptable.

34. In terms of convenience expenditure capacity, the retail study assessment demonstrates that there is no requirement for additional convenience goods floorspace across the study period in either West Fife or East Fife. Only in Mid Fife, there is a notional £6.09m to support additional convenience goods floorspace by 2024. There is capacity for comparison goods expenditure within West Fife to support the development of new retail floorspace. There is no residual expenditure capacity to support additional comparison floorspace in Mid Fife and in East Fife, there is residual surplus to support small new town centre floorspace. The council has confirmed that the scale of proposed development will be assessed against the retail capacity study alongside the sequential test.

35. Policy 6 indicates that town centres will be the first choice for uses likely to attract a large number of people including retail and refers to an assessment against the latest Fife retail capacity study being necessary for some retail and leisure developments outwith town centres. This seeks to ensure that thriving town centres are hubs of activity in the local community. I am also aware that the settlement plan for the North Dunfermline Strategic Development Area identifies a development requirement for local shops acknowledging the retail needs of these new communities, as does the development requirements for other large housing allocations.

36. Taking all of the above into account I am satisfied that, taking the plan as a whole, retail matters are adequately addressed and that the spatial strategy should remain unaltered with regard to planning for new retail development.

Energy

37. I agree that the Fife Energy Corridor covers some of the most scenic stretches of the Fife coast and find that reference to protecting the natural attributes of the area
should be added to the proposed plan in the same way as it is referred to with regard to wind farms and wind turbines.

38. The Thornton – Leven rail link is dealt with in Issue 14.

Conclusion

39. Overall, and subject to the changes recommended below, I consider the spatial strategy of the proposed plan to be appropriate.

**Reporter’s recommendations:**

I recommend that the following modifications be made:

1. On page 11 of the proposed plan, insert the word “potential” before the reference to the A92 upgrade in figure S3 - Spatial Strategy and on page 93 of the proposed plan for GLE 036, insert the word “potential” before the location “A92 Route Strategy improvements”.

2. On page 11 of the proposed plan amend the references in figure S3 – Spatial Strategy, to the Leven rail link and the Dunfermline/Alloa passenger rail link as follows:

   “25 Safeguarded Leven rail link*
   28 Safeguarded Dunfermline/Alloa passenger rail link**”

Add the following safeguarded rail halts to the key under “Movement” and identify as such on the illustrative plan:

   “Safeguarded rail halt – Bawbee Bridge*
   Safeguarded rail halt – Newburgh*
   Safeguarded rail halt – Wormit***”

Add the following to the bottom of the key:

   “** There is currently no commitment or approval for these proposals from Transport Scotland.”

3. Add an asterisk after the reference for each of the new allocations in the settlement plans and include an explanation in the settlement plans introduction on page 19 of the proposed plan.

4. Add an asterisk after the relevant site notation for each of the new allocations on the proposals map and include an appropriate explanation on the key/s.

5. On page 12 of the proposed plan under “Low Carbon and Energy” add the following sentence to paragraph 18:

   “The Fife Energy Corridor covers some of the most scenic stretches of the Fife Coast and the protection of the natural attributes of the area will be addressed when individual development proposals are being implemented or considered.”
6. On page 15 of the proposed plan under “Dunfermline Area Strategy” add the following new third sentence to paragraph 40:

“The retention of the Rosyth rail link is a strategic priority and vital to safeguarding the economy, jobs and port related facilities for future generations.”

7. On page 16 of the proposed plan under “Tay Bridgehead Strategy” add the following to the beginning of paragraph 59:

“The proposed Park and Ride facility at the Tay Bridgehead area will improve access to Dundee and provide a range of travel options. This, along with the investigation for upgrading the A92 corridor…”

8. On page 155 of the proposed plan, for site ROS 013, Rosyth International Container Terminal, replace the second sentence of the first paragraph with the following:

“The Rosyth rail link should be safeguarded to serve the container terminal. The rail link is a strategic priority and vital to safeguarding the economy, jobs and port related facilities for future generations.”
### Issue 3b

#### West Fife Area Strategies

**Development plan reference:** Fife Spatial Strategy, Pages 14 and 15  
**Reporter:** Robert Maslin

**Body or person(s) submitting a representation raising the issue (including reference number):**

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**Provision of the development plan to which the issue relates:**
Dunfermline Area and West Villages Area strategies

**Planning authority’s summary of the representation(s):**

**Dunfermline Area Strategy**

Scottish Enterprise (1046): Support for Strategic Development Area for Dunfermline and its significant contribution to housing and infrastructure provision.

Welcome recognition of economic importance of Rosyth port, according with National Planning Framework 3 (paragraphs 3.21 and 6.7 National Development), and the safeguarding of existing land and further allocations for future employment and investment opportunities.

Townhill Community Council (636): Acknowledge that the strategy for the Dunfermline Area is largely driven by SESplan. Too many houses are proposed for the area resulting in significant pressure on the existing infrastructure and facilities, especially in small settlements such as Townhill. Support housing in Townhill area, although not unconditional, with impacts on Townhill residents and community of paramount importance. The Community Council views submitted to the Scottish Government in January 2011 are still relevant and strongly held – that building will merge Townhill with Dunfermline, with negative impacts on its identity and the community, and that careful consideration needs to be given to its heritage and landscape setting in decision making.

The route of the northern relief road (DUN 067) will have impacts of concern on the village – removing valuable green spaces and paths and with major logistical difficulties relating to bridges and traffic chaos.

Graham Neil (1097): Object to proposal to build around 10 000 houses in the north of Dunfermline without fully funded roads: a northern relief road completed prior to allowing housing along the route; and a route to take traffic from the north to south of the town and on to Edinburgh and south of the Forth where most residents seem to work.

Poor infrastructure, in terms of roads and general amenities, in relation to the number of houses proposed in the Milesmark & Baldridge Community Council area. There is no health centre and insufficient school capacity in advance of a new school.

I & H Brown Ltd (1274): Support strategy to direct further development to the north west/north of Dunfermline. Note that they have shown consistent support for the...
Council’s strategic priorities to support Dunfermline Town Centre, addressing the imbalance created through development in the east by promoting strategic expansion of Dunfermline to the north west/north.

The strategic priority for development and associated infrastructure in the north west/north should not be undermined by sites in other locations (eastern Dunfermline and outwith strategic allocations), with lesser infrastructure commitments, being delivered ahead of and at the expense of these strategic priorities. This is primarily a matter of phasing, with a danger that the take up of residential land, needed to drive growth of north west/north Dunfermline, does not come forward as quickly as sought.

Reference is made to paragraphs 37 of the proposed Plan (CD5 page 14) (the northern relief road and western distributor road being essential to the delivery of the strategic developments) and to page 71 of the proposed Plan (CD5) (the production of masterplans by developers), with emphasis given in the representation to the reference to ‘phasing’ of sites. Further reference is made to Policy 3 of the proposed Plan (CD5 pages 199 – 202) relating to the delivery of infrastructure and emphasis is given in the representation to criterion 7 in the policy referring to ‘timetabling’ of infrastructure delivery.

Taylor Wimpey (1345): The Dunfermline Area strategy recognises that the area is well placed for significant further development, citing paragraph 39 (CD5 page 15) where it refers to the area around Rosyth, Inverkeithing and Dalgety Bay. However, growth opportunities are constrained in these settlements and the strategy needs to follow through with settlement proposals (with specific reference to land at Spencerfield).

Mary McLaren (1372): Object to proposed housing to the north of Dunfermline on grounds that no plan or funding in place for northern link road required to support the housing. Particularly objection to sites DUN 040 Craigluscar Road/Carnock Road, DUN 041 North Dunfermline (Swallow Drum), DUN 042 Carnock Road, DUN 045 Rosegreen, Carnock Road: on basis that present roads in this area do not have capacity to support traffic from those sites; the sites have no direct links to the motorway network or Park & Ride facilities; and, that there are already two Strategic Land Allocations from the previous local plan in the area which have not been developed.

David Croft (1562): The plans for north Dunfermline (specifically proposals DUN 038 Kent Street, DUN 039 North Dunfermline (Colton), DUN 044 Land to the north of Wellwood, DUN46 Chamberfield Road, DUN067 Northern Link Road, TWH 001 Townhill Power Station Site and TWH 002 Townhill Loch Car Park) would largely enclose Townhill Country Park adversely impacting on the environment and wildlife in the park. Proposal DUN 043 Halbeath further reduces the wildlife access to Townhill Country Park. The impact of protracted road works, in particular on Townhill Road, will cause traffic delay, increase pollution and accident risk. Development would result in the two fields remaining to the south and south west of Townhill Loch will be isolated from other agricultural land making them likely to fall into disuse and ultimately resulting in further development. Development of proposals DUN 038, DUN 044 and TWH 001 will result in the coalescence of Wellwood, Dunfermline and Townhill with a negative impact on the Townhill community. The land at Dunfermline North should remain as agricultural land or be planted with native woodland to enhance the country park.

In the interests of transparency, landowners should be named together with likely sales value.
The consultation process disenfranchises residents who are not computer literate from influencing major decisions.

Paul Munro (1810): Agree with need for more housing in and around Townhill but refer to Scottish Government Reporter’s response to community objections to proposals at Muir Road and Waxwing (January 2011) (CD21 pages 364 – 367). Reporter agreed with objections including avoidance of merging of Townhill with Dunfermline and issues of access. The proposed sites would place a considerable burden on local infrastructure and services. Proposal DUN 067 Northern Link Road, would be detrimental to public access, remove recreational opportunities and increase risk in relation to access to loch. It would impinge on green belt, requiring existing track widening to facilitate road construction and bridge demolition. The existing Kingseat Road/B912 junction and Whitefield Road is already dangerous and further complication of the road network would be unwise. More consideration should be given to access road around the north of the village and circling Townhill Wood to join the B912 to the north of DUN 043 Halbeath.

Karen Valentine (1926): Object to plan for Dunfermline for reasons that: significant loss of greenspace required for leisure and recreation; insufficient infrastructure with worsening of already overloaded road network (citing roads linking M90 to town centre, Sinclair Gardens roundabout and poor air quality in Appin Crescent) and problems with school capacity. Risk that Dunfermline becomes commuter town for Edinburgh with increased traffic on the M90 and Forth crossings. There has not been proper consultation. Maps and plans should have been available in all public places for long period of time to enable all to comment.

Crispin Hill (1714): In planning terms the area around around Rosyth, Inverkeithing and Dunfermline is attractive for development but welcome decision to not include the green network asset land at Spencerfield as a development site, for reasons which outweigh the arguments of developers.

Crispin Hill (1718): Recommends Habitats Regulations Appraisal for all plans and projects close to the Firth of Forth area that might be used as supporting habitat by any of the qualifying interest of the Firth of Forth Special Protection Area.

Iain Thomson (2043): Support proposed development to the west of Dunfermline (DUN 040 Craigluscar Road/Carnock Road, DUN 041 North Dunfermline (Swallow Drum), DUN 042 Carnock Road) as will help address the imbalance caused by the eastern expansion with residents more likely to use local businesses which will help regenerate Town Centre. Existing good public transport links into town which will help reduce traffic congestion and burden on town centre parking. States that number of local businesses support this view.

Mr & Mrs Westwater (2164): Support continued growth of Dunfermline, recognising shortage of housing across Scotland. Development to the east of the town has gravitated growth away from the natural town centre and new development should be carried out in a balanced way, sustainable and accessible by various modes of travel. New family housing in well-designed neighbourhoods should be a priority, supported my mix of homes for the elderly. Higher density housing and a new college campus should be priorities for the town centre. Support re-establishment of a passenger rail service between Dunfermline and Alloa/Stirling aiding provision of more direct rail services to Glasgow and the west of Scotland. Support improved road links to Kincardine and
Taylor Wimpey (3693): Support strategy for the Dunfermline Area, noting it is in accord with SESplan’s spatial strategy for Fife which supports growth in the North Dunfermline Strategic Development Area (referring to paragraph 61 of SESplan (CD2 page 16). Promote allocation of new homes in the north east of Dunfermline at Halbeath and refer their supporting Development Framework Report which confirms the site’s effectiveness. Refer to proposal DUN 067 Northern Link Road and supports that the Council will take responsibility for the bridge crossing over the railway and its connection to Kingseat Road. Developer contributions should be sought from all North Dunfermline strategic allocations.

Highlight omission of the earlier candidate site at Lyne Burn (LDP-DUN 015) recommending that this site should be safeguarded for the potential provision of the Lyneburn Bypass, to keep all options available for the provision of comprehensive traffic mitigation. The 3.0 hectare site should be allocated for Class 4 employment use, in accord with the Council’s requirement for additional and effective employment land in Dunfermline. This proposal includes the provision of park and ride facilities (for Queen Margaret Station) to supplement the proposed improvements to the local transport network at Halbeath. Refer to further details of the proposal in the supporting Lyneburn Development Framework Report (see attachment with rep 3693).

Stirling Developments (3679, 2028, 2033): Note that paragraph 36 in the Proposed Plan (CD5 page 14) comments that development proposals are progressing to the north west of the city but that no reference is made to the remaining part of the Strategic Land Allocation. They have had various discussions focussed on delivery of development at Broomhall in the south west part of the SDA. These include: with Fife Council Services to discuss design and place making, delivery and strategic transport interventions; with Scottish and Southern Energy to assess energy networks, connections and upgrade work; and with Scottish Water regarding Drainage/Water Impact Assessment Proposals. They are committed to early delivery of a first phase of development at Broomhall with an anticipated start date for development in 2016.

We note the reference to Education under ‘development requirements’ which involves the provision of two new primary schools, one of which is to go to Broomhall. We note that Fife Council is currently undertaking consultation on primary school closures and we look forward to receiving confirmation on timescales for this process to be concluded.

‘Neighbourhood-wide combined heat and power (CHP) systems’ and ‘recycling facilities’ are referenced twice under ‘development requirements’ for Site DUN 035. One of each of these bullet points should be deleted from the Proposals Table.

Gordon Hill (769), D Callander (765), John Jenkins (773), Elizabeth McKay (746), Ross McKay (749), Lindsay McKay (752), Patricia Brown (756), T Hamilton (761), J M Watson (779), Alison & Steven Rodger (786), Sheona Richmond (789), J Atherton (1084), Mary Baird (1090), Arthur Braid (1007), Graham A Black (1020), Ian Pollock (1042), Jennifer Forrester (1087), Samantha Steven (1093), Stuart Steven (1096), Sylvia Greig (1100), Thomas Greig (1103), Tracey Coll (1106), Gordon Horn (1109), J W Williamson (1112), Ken & Grace Nicol (1116), Sheila Robinson (1119), Thomas P Graham (1123), John Gunn (2453), Lynne Ferguson (2488), A Guile (2440), Steven Inglis (2442), Terry Guile (2445), Lorraine Guile (2449), Stacey Gunn (2456), Barbara Thomson (2458), T Inglis (2463), Alison Inglis (2467), Esther Wren (2470), Norma Wren (2472), Margaret
Thomson (2475), Graham Suaden (2481), Margaret Waterson (2485), Joanne Crumley (2491), Brian Palmer (2492), Frank Wilson (2493), Annie Palmer (2495), Darren Berry (2498), Sandra McKenzie (2504), Alex McKenzie (2508), Tom Gibson (2514), Susan Wallace (2540), J J Yfe (2544), Christine Wallace (2549), Archie Ferguson (2553), R Ferguson (2557), David Kerr (2561), Ann Kerr (2565), Joan Davison (2570), Ella Coates (2960), Barbara Waller (2838), David Adamson (2841), Carol Adamson (2846), T P Waller (2852), Pamela Wilson (2857), Irene Wilson (2865), Andrew S Wilson (2872), Michael J Chadfield (2879), Sheila A Chadfield (2886), Nancy Ray (2895), Mark Sherry (2906), Lorraine Harvey (2911), Kvetka Jiraskova (2917), S Lawrence (2923), Janis Lawrence (2957), Carolyn Kinneear (2964), Patricia Brearey (2969), David Brearey (2973), Isabella Saunders (2979), Terry Tully (2982), Mary Tully (3009), James Forbes (3012), Steve McLean (3030), Mark Monaghan (3033), James Spalding (3041), Anne Forbes (2991), Matthew Forbes (2996), Janet MacPherson (3004), Kevin Cummings (3015), Sharon Monaghan (3036), Elaine Spalding (3044), E McLean (3054), Sheila Malpas (3070), Lisa Malpas (3088), David Stubbs (3194), Mary Simpson (3098), Kenneth Walker (3105), Steven Bowman (3110), Sharon Easton (3117), Jean Tait (3125), Rachel Thomson (3133), Aileen Emms (3191), James Leggate (3198), Mary O’Dell (3201), Michael J Emms (3225), Mr & Mrs A & L Duff (3231), J Whyte (3234), Lorna Clark (3181), Pamela Paxton (3186), Kevin Searle (3242), Christine Hyde (3264), Barbara Inglis (3274), Calum Dewar (3290), Catherine Brownlee - Noble (3429), Elizabeth Bailey (3433), Gail Hogg (3438), Ian Harper (3445), Irene Marshall (3467), Janet Brown (3472), Janet Sauderson (3488), Lee McLean-Marshall (3507), Seven Inglis (3604), Norman Ainslie (3529), J Nicol (3533), Jane Ainslie (3538), Niall Frame-Noble (3596), Robert Lowes Noble (3599), Stuart Nicol (3607), V Richardson (3612), John Lowe (3616), Graeme A Whyte (3622), David McLean (3065, 3897): Object to the inclusion of the sites in north Dunfermline. Dunfermline cannot cope with any more houses. The developers and Fife Council have not done enough to prove north Dunfermline sites in FIFEplan are suitable for the planned development. The developers and Fife Council have not carried out a proper assessment of the adverse impacts on the Dunfermline environment and amenity from FIFEplan. The infrastructure of Dunfermline cannot cope with the existing population; increasing this by the numbers in FIFEplan will simply make this much worse. Fife Council has failed to ensure existing approved strategic housing developments are delivered first.

Townhill Community Council (637): Object to inclusion of sites DUN 038 Kent Street, DUN 046 Chamberfield, DUN 039 North Dunfermline (Colton), DUN 067 Northern Link Road, TWH 001 Townhill Power Station site, and TWH 002 Townhill Loch Car Park. The main areas of concern are 1.transport including the Northern Relief Road; 2.coalescence between Dunfermline and Townhill; 3.school provision; and 4.environment - loss of Green Space, paths and impact on wildlife.

Dr Jerzy Mlotkiewiecz (1805): Object to proposed development of housing on sites DUN 042 Carnock Road, DUN 040 Craigluscar Road/Carnock Road, DUN 067 Northern Link Road and DUN 041 North Dunfermline (Swallow Drum) for the following reasons: with 2,000 new homes on these sites, the road infrastructure is seriously lacking to cope with what could amount to 4,000 extra vehicles using the A907; the development of the old Curtis Motors/MFI site has now commenced and so there will be even heavier traffic flows on the A907; I have not seen any reports on environmental/toxicity/chemical assessment of the land north of the Carnock Road where the old Victorian dump was situated; and there are disused mine shafts in the area.

Marion Gillies (2238), Stuart Gillies (2247): Object to excessive number of houses that
are planned for the North of Dunfermline, in particular sites DUN 040 Craigluscar Road/Carnock Road, DUN 041 North Dunfermline (Swallow Drum), DUN 042 (Carnock Road) and DUN 045 Rosegreen, Carnock Road, the developments have been proposed without any regard for the failings of the current road transport system and without the funding for a Northern Link Road.

Simon Owen (744): Remove all North Dunfermline sites from the plan until a proper strategic master plan is developed. This should consider all of these developments as interrelated and take steps to work within this integrated approach to protect the existing amenity, protect the existing and planned environment and encourage good design and execution of this significant expansion to the north of Dunfermline.

William and Jean Smith (2726): Object to development in the north of Dunfermline. Concerned that additional development will lead to further commuting, traffic congestion and potential flooding issues.

John Jenkins (3073): Object to further development in north Dunfermline because of existing traffic problems.

Fife Council note: The representations made by the following people refer to proposal DUN 045 Rosegreen, Carnock Road. We believe this is an error and that their representations should refer to proposal DUN 043 Halbeath. Therefore the summary refers to DUN 043 rather than DUN 045.

Howard Rainey (3401), Mavis Cairns (3406), Thomas Hogg (3600), Robert Bailey (3617), John Muir (3794), Sheila Flaherty (3611), David Donaldson (3804), Christopher McCallum (3742), Steven Lawrence (3744), Jennifer Paxton (3739), S M Best (3792), Norman Taylor (3793), Julie G Taylor-Black (3795), Hamish McDonald (3796), Samuel Stevenson (3797), J W Thomson (3798), Jacqueline Morrison (3799), I G Brindle (3800), Moira Muir (3801), Lorraine Toner (3802), Rae Todd (3803), Catriona Gemmel (3805), Mary Henderson (3806), Mark Toner (3807), Adam Stonehouse (3808), Henry Murrell (3809), A Watts (3810), Yvonne Stenhouse (3811), G B & H M D Porter (3812), Charles Stewart (3813), Ann Taylor (3814), Lt Col (R) Ray Dimmock (3817), Sandra Hamilton (3927): Dunfermline cannot cope with any more houses. Fife Council has failed to carry out a democratic process involving affected communities. If houses must be built then the development of DUN 043 Halbeath should not be approved by the council until after the Dunfermline Northern Relief Road is built. The developers and Fife Council have not done enough to prove north Dunfermline sites in Fifeplan are suitable for the planned development. The developers and Fife Council have not carried out a proper assessment of the adverse impacts on the Dunfermline environment and amenity from FIFEplan. The infrastructure of Dunfermline cannot cope with the existing population; increasing this by the numbers in FIFEplan will simply make this much worse. Fife Council has failed to ensure existing approved strategic housing developments are delivered first.

Barbara Thomson (3743): Not been given a proper chance to comment on FIFEplan. Infrastructure of Dunfermline cannot cope with the existing population; increasing this by the numbers in FIFEplan will make this much worse.

**West Villages Area Strategy**

Tina Chapman (8): The allocation of new housing in West Fife should be in conjunction
with local people as they live and function in these villages and have experience and information which could contribute to planning sensitively but effectively.

Donald Murdoch (650): Need for housing, particularly low cost and sustainable. Emphasis on commuter accommodation is not good for local services or community. Community engagement totally inadequate.

Crombie Residents Association (962): Great regret for the closure of local school. Petition of locals revealed 71% supported development of LDP site CRM001. CRA feel the Council is ignoring sustainable development of west fife Villages and will vote accordingly in future.

Rob Thompson (1353): More accommodation for the elderly needed.

Campion Homes (1892): Selection of extra housing land in emerging LDP appears arbitrary and disregards underlying FIFEplan Spatial Strategy where facilities, need and impact are considered. Little or no evidence of existing settlement assessment or matching of capacity to proposed demand. No assessment of threats or benefits. Over-allocation and no allocations within the LDP appear unbalanced and fail to meet the needs of local communities or assist delivery of objectives. Analysis of the Plan so far display an imbalance between settlement size and housing allocation. For example Aberdour and Camock, have capacity to cater for more than the allocation level proposed, while Cairneyhill and Saline have capacity issues, relating e.g. to Primary School education and drainage, but have over-allocations. The underlying concept of sustainable development requires that new development be located in accessible locations and that best use is made of available infrastructure /resources. It is difficult to determine how this fundamental approach to new development and the FIFEplan strategy has been followed through to the scale of development being promoted (or not) and the individual site selection process.

Persimmon Homes (East Scotland) (1962): Agree sites should be spread around Fife, however para. 34 states ‘much of the allocation is still to be developed’ indicates that there is limited interest; otherwise the sites would be more progressed at this point. Suggest new allocations should be removed, and allocations made in better locations which exhibit greater developer interest

I Spowart (2053): Paragraph 34 of the Proposed FIFEplan is supported. the owner is currently progressing a master-planning process for the future delivery of the allocated and proposed development.

Wemyss Estates Trustees (2103): Welcome the strategy and the allocation of site CNH002, Conscience Bridge, for Cairneyhill.

West Fife Villages Community Council Forum (2804), West Fife Villages Community Projects Group (2814): Strongly objects to the strategy West Fife due to lack of analysis.

Avant Homes (3697): Supports further allocations in the West Villages Area due to its proximity to jobs, services, and other infrastructure which allows access to the rest of Fife and the wider region. The strategy is in accord with SESplan's strategy for Fife which continues to support growth in the West Villages Area (CD2 SESplan paragraph 61).
### Modifications sought by those submitting representations:

<table>
<thead>
<tr>
<th>Townhill Community Council (636):</th>
<th>Reduction in number of houses proposed for the area. Transport Assessment (2011) (CD 56) should be updated.</th>
</tr>
</thead>
<tbody>
<tr>
<td>I &amp; H Brown Ltd (1274):</td>
<td>Statement needed clarifying Council's priorities and strategy to promote the early delivery of development to the north west/north required, to ensure that development proposals outside these strategic allocations do not unnecessarily delay the expansion of Dunfermline. A statement required within paragraphs 36 to 38 (Dunfermline Area Strategy) to ensure early dialogue with landowners within Strategic Development Areas and encourage explanation of phasing proposals and commitment to infrastructure funding to the north/north west.</td>
</tr>
<tr>
<td>Taylor Wimpey (1345):</td>
<td>Housing land to be identified at Spencerfield.</td>
</tr>
<tr>
<td>Mary McLaren (1372):</td>
<td>The housing allocation should be spread throughout Dunfermline and the West Fife Villages in the interest of fairness.</td>
</tr>
<tr>
<td>David Croft (1562):</td>
<td>The land at Dunfermline North (specifically proposals DUN 038 Kent Street, DUN 039 North Dunfermline (Colton), DUN 044 Land to the north of Wellwood, DUN46 Chamberfield Road, DUN067 Northern Link Road, TWH 001 Townhill Power Station Site and TWH 002 Townhill Loch Car Park) should either remain as agricultural land, planted as native woodland or be absorbed into the Country Park. The consultation process needs to be rethought to involve all those who will be affected.</td>
</tr>
<tr>
<td>Taylor Wimpey (3693):</td>
<td>Allocate candidate site LDP-DUN015 at Lyne Burn (3.0ha) for Class 4 business use.</td>
</tr>
<tr>
<td>Stirling Developments (3679, 2028, 2033):</td>
<td>Reference should be made under the heading ‘Dunfermline Area Strategy’ to the extensive work undertaken towards submitting a planning application for a first phase of development at Broomhall in the south west part of the Strategic Development Area. The words ‘and south west’ should be inserted after the words ‘to the north west’ in paragraph 36. Neighbourhood-wide combined heat and power (CHP) systems’ and ‘recycling facilities’ are referenced twice under ‘development requirements’ for Site DUN 035. One of each of these bullet points should be deleted from the Proposals Table.</td>
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Dr Jerzy Mlotkiewicz (1805): Delete sites DUN 042 Carnock Road, DUN 040 Craigluscar Road/Carnock Road, DUN 067 Northern Link Road and DUN 041 North Dunfermline (Swallow Drum) from the proposed plan.

Townhill Community Council (637): Delete sites DUN 038 Kent Street, DUN 046 Chamberfield, DUN 039 North Dunfermline (Colton), DUN 067 Northern Link Road, TWH 001 Townhill Power Station Site, and TWH 002 Townhill Loch Car Park from the plan.

Marion Gillies (2238), Stuart Gillies (2247): Delete sites DUN 040 Craigluscar Road/Carnock Road, DUN 041 North Dunfermline (Swallow Drum), DUN 042 Carnock Road and DUN 045 Rosegreen, Carnock Road from the plan.

Simon Owen (744): Remove all North Dunfermline sites from the plan until a proper strategic master plan is developed.

Howard Rainey (3401), Mavis Cairns (3406), Thomas Hogg (3600), Robert Bailey (3617), John Muir (3794), Sheila Flaherty (3611), David Donaldson (3804), Christopher McCallum (3742), Steven Lawrence (3744), Jennifer Paxton (3739), S M Best (3792), Norman Taylor (3793), Julie G Taylor-Black (3795), Hamish McDonald (3796), Samuel Stevenson (3797), J W Thomson (3798), Jacqueline Morrison (3799), I G Brindle (3800), Moira Muir (3801), Lorraine Toner (3802), Rae Todd (3803), Catriona Gemmel (3805), Mary Henderson (3806), Mark Toner (3807), Adam Stonehouse (3808), Henry Murrell (3809), A Watts (3810), Yvonne Stenhouse (3811), G B & H M D Porter (3812), Charles Stewart (3813), Ann Taylor (3814), Lt.Col (R) Ray Dimmock (3817), Sandra Hamilton (3927): DUN043 should not be approved by the Council until after the Dunfermline
Northern Relief Road is built.

**West Villages Area Strategy**

Rob Thomson (1353): Suggest adding; "in the West Fife Villages there is a lack of elderly care accommodation for the semi-independent. Innovative solutions are sought to enhance the lives and care for the elderly in the community by identifying suitable sites within the heart of rural villages to allow residents to stay in their community while freeing up single occupancy homes."

West Fife Villages Community Council Forum (2804), West Fife Villages Community Projects Group (2814): A comprehensive analysis of West Fife is vital. Plan should state;

- Where the jobs in West Fife are.
- What the services in West Fife are
- What capacity can Services absorb
- What is the infrastructure in West Fife
- Does is it need improved?
- A comprehensive analysis of the current situation is before allocating housing land.

Avant Homes (3697), Wemyss Estates Trustees (2103), I Spowart (2053), Campion Homes (1892), Crombie Residents Association (CRA) (962): No modification sought or mentioned.

Persimmon Homes (East Scotland) (1962): Suggest new allocations should be removed, and allocations made in better locations which exhibit greater developer interest.

Donald Murdoch (650): Need for more housing for local people.

**Summary of responses (including reasons) by planning authority:**

**Dunfermline Area Strategy**

Supplementary guidance for housing land (CD3) in the SESplan area determines the scale of the housing requirements to be met in the SESplan area through new housing land allocations in the Local Development Plan for the period up to 2026 (see Issue 2b Homes and associated Housing Paper).

Scottish Planning Policy (SPP) 2014 (CD1 paragraph 122, page 29) states that local development plans should allocate appropriate sites to support the creation of sustainable mixed communities and successful places and help to ensure the continued delivery of new housing. FIFEplan's housing land supply will be met by proposing development focussed on towns and villages having regard to the range of facilities, local need, and likely impact on their location. Proposals for employment, housing, and local services, are, where possible, located in close proximity to encourage sustainable living and to integrate with existing communities.

SPP also requires that the Council must maintain at least a 5 year effective housing land supply in the Dunfermline & West Fife Housing Market Area, and the Local Development Plan should identify sufficient sites to meet the housing land requirement for 10 years. Allocating a generous supply of land for housing across the Housing Market Areas in the
Local Development Plan gives the flexibility necessary for the continued delivery of new housing should unpredictable changes to the effective housing land supply occur during the lifetime of the Local Development Plan.

The Proposed FIFE plan allocates land for housing across the Dunfermline & West Fife Housing Market Area, sufficient to meet housing requirements. The sites allocated in the FIFE plan Local Development Plan will meet the tests of effectiveness as set out in Planning Advice Note 2/2010 Affordable Housing and Housing Land Audits (CD10 paragraph 55, page 17) and Housing Land Audits.

Dunfermline is the focus of existing Strategic Development Areas to the south-west, west and northwest of the city. Development proposals are progressing in these areas. (13/03683/EIA Wellwood (SD1) Planning Permission in Principle was submitted by I & H Brown in December 2013 and was approved in March 2015. Pittencrief Easte has recently indicated its continued commitment to developing land at Berrylaw.

15/01336/SCR: Broomhall SDA - EIA Screening Request was submitted, 08/04/15, on behalf of Broomhall Home Farm Partnership. Stirling Developments has demonstrated its commitment to developing at Broomhall through ongoing dialogue with Fife Council.

SESplan (see CD2 pages 23-26) directs further development to the north of the city, so land has been identified in line with those requirements; although other housing sites are provided across West Fife to provide for range and choice. In the north-west the new sites add to the existing proposals identified in earlier development plans and, in the north east a new allocation is identified at Halbeath (Proposal DUN043). The provision of a Northern Link Road and Western Distributor are essential to the delivery of these strategic developments.

Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies in infrastructure have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision, for example, new schools.

A Strategic Transport Appraisal (STA) is being commissioned to look at wider impacts on the trunk road network. The STA has been arranged in discussion with Transport Scotland and with input from Fife Council Transportation and Environmental Services. It is expected that the information from this will inform development obligations.

Fife Council’s Planning Obligations Framework (March 2015) (see CD46) provides guidance on how developers are required to fund community infrastructure when this is needed as a result of new housing or commercial activity. FIFEplan requires developer investment in new roads and schools. Fife Council is also continuing to fund infrastructure through the approved Capital Plan and by exploring new funding mechanisms. This includes strategic transport interventions such as the Northern Link Road, where each developer along its route will be required, through planning conditions, to provide a section of the road through their site.

Individual proposals will be subject to traffic assessments which will identify measures and interventions required to make development proposals acceptable in terms of traffic.
Site investigations and an Engineering Constraints Report will be required at the masterplan and planning application stages.

All sites in the Proposed Plan have also been assessed as part of the Strategic Environmental Assessment (SEA) process (see CD15), which is a means to judge the likely impacts of a public plan on the environment and to identify ways to minimise that effect, if it is significant.

Comments on, and responses to, individual sites are set out in Issue 7A (1) and (2).

FIFEplan has been amended prior to Examination to correct any typing errors.

Comments on the consultation process are addressed by the statement of conformity within the Participation Statement.

West Villages Area Strategy

Rob Thomson (1353): Fife Council recognises the need to provide accommodation to meet the needs of the community. However this is not a specific West Fife issue. The Council has a programme for building care homes in many towns in Fife. There are also many locations across Fife where the council is working with private developers to encourage the delivery of care homes and other accommodation suitable for the elderly. We will continue to look for opportunities to address the needs of the elderly.

However this wording could be added to the overall strategy section to recognise our support for the principle of elderly being looked after in their communities rather than moved elsewhere.

West Fife Villages Community Council Forum (2804), West Fife Villages Community Projects Group (2814): All the issue raised in this response are relevant to the determination of the strategy for the area. They were considered at the strategic scale through the SESplan spatial strategy assessment, and through the site assessment process that was carried out alongside the Local development Plan, Main Issues Report and Proposed Plan. Therefore no additional assessment is required to justify the approach in the plan.

Avant Homes 3697, Wemyss Estates Trustees (2103), I Spowart (2053): Support welcomed.

Persimmon Homes (East Scotland) (1962): The new allocations represent a spread of size and location for new development across the west Fife area. As such they can address the needs of the area. The response does not identify where alternative sites should be developed but the aim of the plan is not simply to meet the needs of the industry but to also address the housing requirements of communities. Therefore no change required.

Campion Homes (1892): Sites have been allocated based on a spatial strategy assessment that was carried out alongside the earlier stages of the Local Development Plan. It has considered the relationship between proposed new sites and the settlements to which they most closely relate and the accessibility to the wider area. Therefore the
final choice of sites is not arbitrary. It is true that some areas have infrastructure capacity issues but it is believed that these can be overcome, and the progression of development is dependent on their delivery. There is no mismatch between the strategy and sustainability therefore no need for change.

Crombie Residents Association (962): The site in Crombie has been ruled out as a result of the site assessment process which identified issues related to the scale of development and adverse impacts on the landscape (CD15). While local views are taken into account in developing the strategy of the plan they are not the overriding issue in determining the suitability of a site. Several other sites have been identified in the West Fife highlighting that the area has not been ignored in terms of new development opportunities. A site specific response detailing further reasons for exclusion is provided within Fife Council Executive Committee report (CD58). No change required.

Donald Murdoch (650): FIFEplan aims to address the development needs of Fife’s communities and has allocated housing and employment land to allow sustainable travel patterns to occur. Housing sites will automatically include an element of affordable housing which will address the needs of local communities. While some housing may end up being for commuters this is entirely in line with the strategy of SESplan and reflects the fact that parts of West Fife relate closely to the job market in Edinburgh. This does not mean that journeys undertaken will be unsustainable and park and ride sites offer the commuter the chance to travel by alternative means to the car. The needs of the area are being met and no change is required.

Tina Chapman (8): It is recognised by the Council that local people will have a particular perspective on the requirements for an area and it is important that they will be involved in the progression of development proposals. All the major developments across the west villages area will be subject to public consultation, the scope of which will be agreed with the Council, as part of the planning application process.

**Reporter’s conclusions:**

**Dunfermline Area Strategy - general - amount of new housing**

1. There is a widespread view that the proposed plan allocates too much land for new residential development in Dunfermline. In connection with this, I note that the proposed plan is being prepared within the framework set by the approved strategic development plans (see paragraph 13 on page 6 and paragraph 4 on page 9 of the proposed plan). I also note that the law requires the council to ensure that the proposed plan is consistent with the strategic development plans (section 16(6) of the Town and Country Planning (Scotland) Act 1997 (as amended)).

2. Dunfermline and its surroundings are within the area covered by SESplan. SESplan is the strategic development plan for Edinburgh and South-east Scotland. One of the strategic development areas identified in SESplan is “North Dunfermline”. At paragraph 67, SESplan says that the North Dunfermline strategic development area will augment the existing strategic land allocations to the south-west, west and north of Dunfermline through the local development plan.

3. Part of SESplan is the “Housing Land” supplementary guidance dated May 2014. Paragraph 3.6 and table 3.1 say that, for the part of Fife covered by SESplan, the
The proposed local development plan must allocate land for 17,140 new houses in the period 2009 to 2019 and for 7,430 new houses in the period 2019 to 2024.

4. Under Issue 2b of this examination, detailed consideration is given to the total amounts of housing land that should be allocated in the proposed plan.

5. The allocation of land for new development at Dunfermline, in common with allocations throughout the plan area, has been subjected to a site assessment process and to strategic environmental assessment. These procedures seek to ensure that development is directed to locations where impact will be minimised and acceptable. My attention has not been drawn to any alternative means by which SESplan requirements for the North Dunfermline strategic development area might be met.

6. My conclusion is that, although a considerable amount of land is proposed for new dwellings in Dunfermline, the amount is necessary to meet established requirements and should not be reduced.

**Dunfermline Area Strategy - general - role of Dunfermline**

7. Regarding the concern that Dunfermline may become a commuter town for Edinburgh, it is apparent from traffic flows that many people already travel daily from the Dunfermline area to the Edinburgh area. In my experience, some travel to work between sizeable communities within the same region is always to be expected.

8. I note that Dunfermline is an important tourist destination and that the vibrancy of the town centre has potential to be enhanced (paragraph 38 on page 14 of the proposed plan). Locations to the south of the town are attractive for business and tourism investment (paragraphs 39 and 40 on page 15). The proposed plan carries forward from the current adopted local plan a number of sites for employment development, including sites adjacent to the motorway network on the east and south sides of Dunfermline and sites in Rosyth. An additional site is identified in Inverkeithing.

9. My conclusions are that new residential development in Dunfermline would not necessarily be occupied to an unacceptable extent by households dependent on travel to Edinburgh for work and that the character of the town would not take on a “dormitory” quality to a detrimental extent.

**Dunfermline Area Strategy - general - traffic**

10. There is concern regarding increased traffic on the M90 and on the Forth crossings. It is contended that the road network is already overloaded.

11. I note the following points. Traffic impacts have been tested by the Strategic Transport Assessment (core document 19). Individual proposals will be subject to traffic assessments to identify action needed to make proposals acceptable in terms of traffic impact. Provision of a northern relief road and a western distributor road is seen as essential to the delivery of the strategic developments at Dunfermline. The Queensferry Bridge is due to open in 2016. There is potential for improved railway passenger services. In response to a request for further information, Transport Scotland says that, so far as its interests are concerned, it is now satisfied that the transport infrastructure identified in the proposed plan is sufficient to accommodate the level of development proposed within the spatial strategy.
12. I find that the proposed plan demonstrates an awareness of the need to improve transport facilities. The plan provides a basis for requiring improvements in association with new residential development. My conclusion is that the Dunfermline area strategy need not be altered in response to the concerns in the representations.

Dunfermline Area Strategy - general - capacity of schools

13. I note that, where potential deficiencies in infrastructure have been identified, in some cases enhanced provision has already been planned. Elsewhere, there will be "on demand" provision. Policy 4: Planning Obligations is designed to secure contributions to, among other things, additional school capacity where this is needed as a result of development. The council proposes to adopt supplementary guidance on this topic. This guidance would include a section on educational provision.

14. My conclusion is that issues of school capacity are capable of being addressed and the plan need not be altered.

Dunfermline Area Strategy - general - development priority

15. There is concern that the strategic priority of providing development and associated infrastructure on the north-west and north sides of Dunfermline should not be undermined by development on other sites with lesser infrastructure needs.

16. I note that SESplan (page 23) says that committed allocations will be augmented with new strategic-scale development. This will include development focused on the North Dunfermline strategic development area. Paragraph 61 says that the strategy includes land already allocated for new homes in the SESplan part of Fife.

17. From the foregoing, I find that SESplan recognises existing committed allocations as part of the complete package of strategic development that is to take place at Dunfermline. SESplan does not suggest that development at Dunfermline North should have priority over or precede development elsewhere at Dunfermline.

18. I note that sites to the north-west and north of Dunfermline are not the only ones with significant infrastructure needs. Development proposed at the south-west of the town (site DUN 035 in the proposed plan) requires provision of a western distributor road.

19. As pointed out in the representation, the proposed plan says that master plans will be produced and these will, among other things, reflect phasing of the sites. Policy 3: Infrastructure and Services (as recommended under Issue 2c) includes reference to a timetable for the delivery of infrastructure. I find that the purpose of these provisions is to ensure that infrastructure is available when needed. They do not need to be extended to give any additional priority to particular sites.

20. Taking all these considerations into account, I conclude that there is no need for the Dunfermline area strategy to assign priority to development on the north-west and north side of the town.

Dunfermline Area Strategy - general - type of housing

21. The type of houses, in terms of internal accommodation, built to meet open-market
demand is generally left to the discretion of the house-builder. Regarding quality of design, I note that Policy 1: Development Principles seeks layouts and design that accord with the Government’s Creating Places policy.

22. From the foregoing, I conclude that the proposed plan should not give special priority to family housing and that the plan makes adequate provision to ensure that new neighbourhoods are well-designed.

Dunfermline Area Strategy - general - greenspace

23. The amount of new residential development envisaged at Dunfermline is considerable. The capacity of the existing Dunfermline Strategic Land Allocation (site DUN 035 in the proposed plan) is estimated to be 4,200 dwellings. The estimated capacity of the North Dunfermline Strategic Development Area (page 71 of the proposed plan) is 3,000 dwellings.

24. I find that development on this scale, in a locality that has little if any brownfield land, must inevitably take up large areas of greenspace. I find that this is acceptable in principle if development incorporates an appropriate amount of open space and landscaping.

25. I note that developer requirements on pages 70 and 71 of the proposed plan include references to open space, an urban park and landscape improvements. For DUN 035, the green network priorities are to establish new high quality greenspace as an integral part of the wider green network within the site. This provides a basis for requiring adequate open space and landscaping.

26. My conclusion is that, with regard to significant loss of greenspace, the proposed plan need not be altered.

Dunfermline Area Strategy - general - identity of landowners

27. Appendix 1 to the proposed plan contains information about land owned by the council. This information is required by law (section 15(3) of the Town and Country Planning (Scotland) Act 1997 (as amended)). This is the only land ownership information that has to be included in the plan.

28. It is my experience that, when land is allocated for development, the value of that land is likely to rise, possibly by a large amount. This phenomenon is not unusual.

29. The representation does not demonstrate that the Dunfermline area is any different from other locations regarding possible increase in land value. Nor does it demonstrate what planning purpose would be served by naming landowners who might benefit from sale of agricultural land for development.

30. My conclusion is that the proposed plan need not identify the owners of land allocated for development.

Dunfermline Area Strategy - north Dunfermline

31. There is widespread concern that land on the north side of Dunfermline should not be allocated for new residential development. In the section headed “Dunfermline Area
Strategy - general - amount of new housing” (above), my conclusion is that a considerable amount of land for new dwellings is necessary at Dunfermline. I find that a substantial proportion of this land must be located on the north side of Dunfermline because this is a requirement of SESplan.

32. Master plans usually contain more detail than would be provided in a local development plan. Preparation of master plans generally follows, rather than precedes, adoption of local development plans. In the present case, the proposed plan (pages 70 and 71) makes provision for the preparation of master plans and sets out matters that the master plans should address.

33. Preparation of master plans for major residential development can require considerable commitment of resources. It would not be reasonable to require preparation of master plans without there being some certainty that development is acceptable in principle.

34. From the foregoing points, I find that it would not be appropriate to delete the north Dunfermline sites until a strategic master plan is developed.

35. The proposed plan (pages 70 and 71) requires certain matters to be included in the Dunfermline strategic development master plans that are to be produced. One of these matters is strategic and local road improvements. As already noted, Transport Scotland is satisfied with transport infrastructure identified in the proposed plan. Under Issue 7a(1), I am recommending that transport assessments be prepared to identify any mitigation that might be needed at the local level. Flood risk assessment is required for the larger sites (for example DUN 039, DUN 040 and DUN 041). I find that these provisions allow for adequate consideration of traffic and flooding and that the north Dunfermline sites should not be deleted for reasons of traffic and flooding.

36. The Halbeath site (DUN 043) is one component of the north Dunfermline strategic development area. It will be subject to the master-planning exercise set out on page 71 of the proposed plan. This exercise will give opportunity to establish details of when the northern link road, any other road improvements and other infrastructure requirements will be provided. In view of these considerations, I find that concerns about roads and other infrastructure do not justify deletion of the Halbeath site from the proposed plan.

Dunfermline Area Strategy - Townhill

37. Townhill is immediately north of Dunfermline. The two are separated by a gap with a width that varies from about 200 metres to about 300 metres. Townhill is centrally positioned in the tract of land that adjoins the north side of Dunfermline. As already noted, in SESplan “North Dunfermline” is a strategic development area in which land allocations are to be made to augment existing strategic land allocations to the south-west, west and north of Dunfermline.

38. I find that the considerations in the preceding paragraph mean that changes to the setting of Townhill are unavoidable.

39. In the proposed plan, there are no new allocations on land adjacent to Townhill. The uses envisaged for site TWH 001 are the same as those contained in the existing adopted local plan. Under Issue 7b, I am recommending that site TWH 002 be deleted.
40. Development on the Colton site, DUN 039, would be separated from Townhill by site TWH 001 and the recreation park. Development on the Halbeath site, DUN 043, would be separated from Townhill by higher ground and Townhill Wood.

41. The most noticeable effect on the immediate setting of Townhill is likely to arise from development on the Kent Street site, DUN 038. Under Issue 7a(2) and Issue 7b, I give consideration to representations concerning the Kent Street site and the Townhill Loch car park site (TWH 002). As just noted, I am recommending that the car park site be deleted. Under Issue 7a(2), I am recommending that the estimated capacity for the Kent Street site be reduced from 120 to 80. The recommended changes to the plan address the concerns about coalescence of Townhill and Dunfermline and effects on the environment of Townhill.

42. A very great deal of new development must be accommodated in the north Dunfermline strategic development area. I find that, in the proposed plan, the vast bulk of this new development is directed to land well to the west and well to the east of Townhill. New development would reduce to some extent the distinctiveness of the setting of Townhill, but not to the extent that might have been expected bearing in mind the scale of development that has to be accommodated.

43. I find that development envisaged in the proposed plan as modified by my recommendations would not cause Townhill to “merge” or “coalesce” with Dunfermline. With careful attention to layout design and landscaping in new development, Townhill would retain much of its distinctiveness.

44. Some of the setting of Townhill Country Park has a rural character, but urban influence is apparent with housing development visible on the southern skyline. I find that the setting would be affected by development on the Kent Street site, DUN 038, and the adjoining Chamberfield Road site, DUN 046 and also by development, including the northern link road, on the Colton site, DUN 039. Users of the country park would be more aware of urban development in the vicinity. This would have an influence on the character of the park itself, but not to an extent that would justify deleting or reducing the size of the proposed development sites.

45. Development on the allocated sites around Townhill could have effects on local access routes and schools. Any such effects could be addressed in terms of policies in the proposed plan, including Policy 1: Development Principles and Policy 4: Infrastructure and Services. Such effects do not therefore provide justification for deleting the sites from the plan.

**Dunfermline Area Strategy - northern link road**

46. I note that the existing adopted local plan includes a “northern expansion link road”. This is “shown as an indicative route for possible future development”. The northern link road in the proposed plan (DUN 067) has a slightly different alignment and is longer. Westwards it extends to the A907 beyond Milesmark. Eastwards it extends to the roundabout on Kingseat Road (east of Halbeath Retail Park).

47. The northern link road would provide essential access to the proposed development sites through which it would pass. It would also be essential to avoid or minimise additional traffic adversely affecting the operation of existing routes within Dunfermline.
48. Construction of the northern link road would be required in terms of Policy 4: Planning Obligations. It is envisaged that each developer along the route would construct part of the road. These arrangements address the concern that at present there is no funding for the road.

49. Concerns regarding the route of the north link road and local effects are considered under issue 7a(1).

Dunfermline Area Strategy - north-west Dunfermline

50. In the preceding section I address concern regarding funding for the north link road. The road would provide necessary improvement to the accessibility of north-west Dunfermline.

51. The master-planning described on page 71 of the proposed plan includes provision for schools, local road improvements and health care. The development management process would identify any action needed to deal with adverse ground conditions.

52. My conclusion is that concerns about road access, school provision, health care provision and ground conditions do not justify deletion or reduction of site allocations in north-west Dunfermline.

Dunfermline Area Strategy - south-west Dunfermline

53. I note that proposals are progressing for development at Broomhall, one of the strategic land allocations in the current local plan. In addition, in response to a request for further information, I note that a proposal of application notice is expected in 2016. Paragraph 36 on page 14 of the proposed plan refers to progress with other strategic-scale proposals. For completeness, reference should also be made to south-west Dunfermline.

54. I agree that duplicating text on page 70 of the proposed plan should be deleted. This can be corrected by the council as a minor error without formal modification.

Dunfermline Area Strategy - town centre

55. I agree that in general it is desirable to encourage higher density housing in or adjacent to town centres, especially when the town centre is a focus for public transport facilities and other services.

56. I note that the proposed plan identifies nine development opportunity sites in central Dunfermline. Two of these appear to have significant residential potential. The Walmer Drive site (DUN 064) is envisaged for a mix of uses, including “high density residential development”. The Pilmuir Works site (DUN 074) is also envisaged for a mix of uses, including housing. Regarding the Pilmuir Works site, there is no reference to density, but it is stated that planning permission has been granted for development that includes residential.

57. Taking all considerations into account, my conclusion is that there is no need to alter the proposed plan with respect to the density of housing in the town centre.

58. Regarding provision of a new college campus in the town centre, my attention has
not been drawn to the existence of an educational body with a requirement for campus facilities in Dunfermline and with resources for implementation. In the absence of this information, it would not be appropriate to alter the proposed plan.

Dunfermline Area Strategy - coastal towns

59. Regarding concern that growth opportunities are constrained in relation to the coastal towns, under Issue 4 I am recommending that several sites in coastal towns be allocated for development.

Dunfermline Area Strategy - Firth of Forth Special Protection Area

60. I note that Policy 1: Development Principles and Policy 13: Natural Environment and Access contain provisions relating to internationally-designated nature conservation sites and Natura 2000 sites. I find that these provisions adequately cater for protection of the Firth of Forth Special Protection Area and that there is no need to include in the proposed plan specific reference to Habitats Regulations Appraisals.

Dunfermline Area Strategy - Lyneburn site

61. The current adopted local plan shows the alignment of a new road through the Lyne Burn site. This is the Lyneburn Bypass (DUN 080). The proposed plan does not retain this proposal. The representor wishes to have the site safeguarded for the potential provision of the Lyneburn Bypass. This would “keep all options open with respect to delivery of comprehensive traffic mitigation”. The site should also be allocated for class 4 business use and for provision of a park-and-ride facility serving the adjacent railway station. Business development with a floor area of 5,000 square metres and a car park with 257 spaces are envisaged.

62. The representor’s Development Framework Report (page 8) refers to “an opportunity for the private sector to partner with the Council to promote the joint funding of the Lyneburn Bypass” and notes that “topography adds to cost of forming the Lyneburn Bypass”. The bypass “provides the means to augment road and junction capacity on Whitefield Road and Halbeath Road until such time as the Northern Link Road is complete”.

63. The representor’s Statement of Site Effectiveness, in relation to deficit funding, notes that “the Lyneburn Bypass (Local Plan Ref:DUN 080) is identified as a Council led project”. Its conclusion is that “the development proposal at Lyneburn for the Lyneburn Bypass (DUN080), station car parking and business use (if required) is an effective site”.

64. In response to further information request 13, the council says that extending the northern link road through the Halbeath site (DUN 043) to the Halbeath Bypass removes the need for the Lyne Burn Bypass. The Lyne Burn Bypass could be included in the proposed plan, but it would have to be made clear that it is only included as an alternative to the council’s preferred option of extending the northern link road through site DUN 043. The Council would welcome provision of a new park and ride facility. Regarding class 4 use, the council says that there is sufficient employment land on nearby sites.

65. I note that the current adopted local plan shows strategic development to the north of Dunfermline and a “Northern Expansion Link Road” (DUN 078). Read in conjunction
with the Dunfermline Transport Assessment (core document 56, figure 6.9), it appears that the eastern termination of the link road is at Whitefield Road. This suggests that there would be a significant increase in traffic on Whitefield Road, hence the need for the Lyneburn Bypass.

66. In the proposed plan, the Northern Link Road extends further east than the link road in the current plan. The Northern Link Road includes a new crossing of the railway near to Halbeath Retail Park. Traffic from the proposed increased area of development land to the north of Dunfermline would thus be able to gain access to the Halbeath Road (A907) corridor without having to use Whitefield Road.

67. I find that the much larger amount of new development now proposed for north Dunfermline will generate a considerable volume of additional road traffic. This traffic will have a direct connection to the strategic road network if the Northern Link Road is constructed. The alternative - making use of Whitefield Road, a Lyneburn Bypass and part of Halbeath Road - would be less direct and possibly more prone to congestion. My conclusion is that the Northern Link Road is the better solution.

68. The representer refers to provision of the Lyneburn Bypass “until such time as the Northern Link Road is complete”. My attention has not been drawn to any investigation of the timing of construction of the Northern Link Road in relation to the timing of development on the various strategic sites. It may be that this is a matter that will be considered at the master-planning stage. It could well be a matter to which attention is given in the transport assessments that I am recommending under Issue 7a(1).

69. In the submissions, I find no reason why there should be any delay in construction of the Northern Link Road, or those parts of it needed to permit commencement of development on the strategic sites.

70. The Development Framework Report refers to joint funding. The Statement of Site Effectiveness refers to a council-led project. I conclude from this that the effectiveness of the site depends on some kind of financial or other contribution from the council.

71. From all the foregoing, I find that it has not been demonstrated that the Lyneburn Bypass is an essential component of the transport infrastructure needed to enable development on the north Dunfermline strategic sites. I now turn to the two other aspects of the representation.

72. I note that council’s observation that, during the recent closure of the Forth Road Bridge, the capacity of the Queen Margaret Station car park had been exceeded and cars had parked on surrounding streets. During my inspection, in the late afternoon on a weekday after the reopening of the bridge, I noted that most of the station car park’s 80 or so spaces were occupied. I find that the prospect of a second car park with 257 spaces would accord with policies aimed at encouraging use of public transport and would meet a likely demand for additional parking arising from development on the strategic sites.

73. I note the council’s view that there is sufficient employment land on nearby sites. There appears to be no reason why the amount of land allocated for employment should not exceed the amount considered necessary, especially if, as in the present case, the site might be attractive to developers by reason of good public transport connections.
74. My overall conclusions are as follows. Including the Lyneburn Bypass in the proposed plan is not justified on the ground that it is an essential component of the transport infrastructure needed to enable development on the north Dunfermline strategic sites. If the bypass were included in the plan, I am not convinced that it would be an “effective” proposal. This is because it appears that implementation is dependent on financial or other support from the council and there is no indication that such support would be forthcoming. The bypass would facilitate two desirable developments - a station car park and class 4 business use. Nothing in the submissions suggests that the proposed plan as it stands would discourage such developments. It would be open to those who wished to undertake such developments to bring them forward through the planning application process. My final conclusion is that the proposed plan need not be altered.

West Villages Area Strategy - overall approach

75. I agree that matters such as the location of employment and infrastructure and the capacity of services are relevant to the preparation of a strategy. The council states that such matters have been given consideration at the strategic scale through the SESplan spatial strategy assessment and through the site assessment process that was undertaken alongside the Main Issues Report and the proposed plan. The representations do not identify specific failures in the analysis of fundamental information nor do they identify changes that should be made to the proposed plan. My conclusion is that the plan need not be altered.

76. It is contended that housing land is being allocated to communities with capacity issues, no housing land is being allocated to communities that do have capacity and that selection of housing land is arbitrary. I note that some allocations in the West Villages Area are continued from the current local plan. This plan was adopted relatively recently. I am not aware of any significant change in circumstances that would justify a change of policy regarding these existing allocations.

77. Regarding new allocation and capacity issues, I note that the representation makes particular reference to primary schools. No details of difficulties have been provided. It has not been shown why any such difficulties could not be overcome by, for example, an acceptable level of developer contribution. Policy 4: Planning Obligations and the intended associated supplementary guidance address the requirement for developer contributions.

78. I agree that, in some cases, the size of some allocations is large when compared to the size of the existing community at which they are located. I do not find this necessarily to be inappropriate. Larger allocations can have advantages such as facilitating an attractive, well-connected layout with perhaps fewer but larger and more attractive open spaces. Where additional infrastructure is needed, it may be possible to provide this to a higher standard than might otherwise be the case.

79. Regarding lack of allocations at communities with capacity for new development, I note that representations seek the inclusion of particular sites in the housing land supply in the West Villages area. These representations are addressed later in this report. The terms of the West Villages Area Strategy, as set out in paragraphs 34 and 35 of the proposed plan, do not preclude the possibility of adding sites to the housing land supply in this part of Fife.
80. I note that much of the existing West Villages housing land allocation is still to be developed (paragraph 34 on page 14 of the proposed plan). I find this is not necessarily an indication that housing sites in the West Villages area are of limited interest, should be deleted and should be replaced by sites elsewhere. The current local plan was adopted towards the end of 2012. It would be surprising if, in the relatively short period since then, a large proportion of the housing allocations had been built out. In addition, paragraph 10 on page 12 of the proposed plan describes the depressed state of housebuilding following the 2008 recession.

81. My conclusion regarding the foregoing various concerns is that the proposed plan need not be altered.

West Villages Area Strategy - Crombie

82. I note that new development at Crombie was considered during examination of the now-adopted local plan. The outcome was that land was not allocated at Crombie for new development. This has subsequently been endorsed by the council’s site assessment process for the proposed plan.

83. My attention has not been drawn to any recent change in circumstances at Crombie that would merit reconsideration of the position. I note that Crombie Primary School is now closed. Development at Crombie is considered in more detail under Issue 4. My conclusion is that the proposed plan need not be altered with regard to new development at Crombie.

West Villages Area Strategy - accommodation for the elderly

84. The council points out that the need to provide care homes and other accommodation suitable for older people is not confined to the West Villages Area. I agree that wherever possible, suitable housing should be provided locally so that older people can continue to live in their own community. Text based on that suggested in the representation should be added to the strategy section of the proposed plan.

West Villages Area Strategy - housing for local people

85. Policy 2: Homes and the related figure 2.2 seek provision of affordable housing. It is also envisaged that there will be supplementary guidance on this subject. I find that these are capable of adequately addressing the concern that there should be low-cost or social housing to meet needs of local people, as opposed to catering for new residents who travel to work elsewhere.

West Villages Area Strategy - consultation

86. Concerns about the consultation process for the proposed plan are considered under Issue 1. Further opportunities for input from interested parties will arise at master plan and planning application stages.
**Reporter's recommendations:**

I recommend that the following modifications be made:

1. On page 12 of the proposed plan as part of the section headed “Homes” insert a new paragraph after paragraph 11:

   “A particular issue in villages and rural communities is lack of accommodation, including care homes, for older people. Innovative solutions on sites within the heart of rural villages will be sought. This could free up single-occupancy homes while enhancing care for the elderly in the community.”

2. On page 14 of the proposed plan, in paragraph 36 in the sentence beginning “Development proposals are progressing…..” after “progressing” insert “to the south-west and”.
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<td><strong>Provision of the development plan to which the issue relates:</strong> Glenrothes and Ore and Upper Leven Valley area, Kirkcaldy Area and Levenmouth Area Strategies</td>
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<td>Episo Boxes GP (3723)</td>
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**Planning authority’s summary of the representation(s):**

**Glenrothes and Ore and Upper Leven Valley Area Strategy**

Glenrothes Area Futures Group (1314): Statements on paragraphs 42, 43 & 44 are welcomed and improvements to A92 must come soon.

Taylor Wimpey (1344): Object to non-inclusion of site in Markinch as this settlement complies with the strategy for this area of focusing on the Fife circle rail line and A92 for further development.

Brian Sheerins (1577): Support strategy for this area which encourages regeneration/development around the Fife Circle rail line and A92.

Persimmon Homes (1963): Object to having SDA’s in marginal locations such as Kelty, Cowdenbeath and Lochgelly. Lochgelly SDA should be removed and these units reallocated to more marketable locations.

Miller Homes East Scotland Ltd (2337): Object to Crossgates not being mentioned as part of the Glenrothes, Ore And Upper Leven Valley Area Strategy.

Episo Boxes GP (3723): Episo Supports the ambitions of the LDP to encourage economic activity and sustainable economic growth across Fife. Investment and regeneration help deliver objectives and the plan aims to encourage business activity and employment to improve local living standards. Overall vision of Fife is welcome and chimes with Episo aspirations for their asset at Saltire, an important destination within the town. However commentary on page 15 of the LDP sets out the strategy for the
specific Glenrothes area, including comments at para. 44 referencing the Saltire Centre. The Plan comments on the location of park, and asserts the potential for the site to be redeveloped in future for housing, given that it does not accord with the Council’s aspirations for Glenrothes town centre. We respectfully assert, as discussed within meetings with Council officers, that it is still our client’s intention to redevelop and regenerate the retail park in accordance with the extant consent. The proposed policy wording is therefore inconsistent with these intentions.

We believe commercial centres, as Saltire, have a significant role to play within the retail hierarchy across Fife, and are supported by national policy. The Saltire centre provides important shopping to the Glenrothes community complementing that available in the town centre. This helps retain expenditure within the local area, which might otherwise leak to rival destinations, creating unsustainable travel patterns to the detriment of all. We therefore request that the policy wording for the site’s future use be removed from the final Proposed Plan, as they fail to accord with national policy for commercial centres, and importantly, our client’s development intentions for the Saltire centre in the future.

Kirkcaldy Area Strategy

Raith Developments Limited (1359): Object to the wording of the Kirkcaldy Area Strategy specifically page 15 paragraph 47 in respect of the Strategic Land Allocations, the terminology used is misleading and confusing. There is a need for consistent terminology to be used to distinguish between the Strategic Land Allocations already allocated within the adopted local Plans, and the two Strategic Development Areas identified in SESplan to avoid confusion between these two.

Elizabeth Dryburgh (1202): Do not object to a cross-Forth transport link but object to the use of a hovercraft due to the level and duration of noise experienced during the trial period.

Levenmouth Area Strategy

Scottish Enterprise (1061): The benefits and necessity of the Leven Link Road project (policy LVA002) should be referred to within the policy section on Levenmouth Strategic Development Area and cross referenced to employment sites within the docks area and the Fife Energy Park.

Welcome paragraphs 50 and 51 regarding the improvements to the road infrastructure and the reintroduction of the Thornton to Leven rail link. However, these improvements should be more clearly indicated on the plan and greater emphasis paid in the plan and the Supplementary Guidance on Planning Obligations, towards delivering the improvements.

Wemyss Estate Trustees (2108): Welcome the proposal to include the existing strategic land allocation at Levenmouth in the Local Development Plan as a Strategic Development Area.

The William Brown Trust (2105): Object to the strategy in terms of lack of sufficient deliverable sites to support the main Strategic Development Area. There is an over reliance on the Levenmouth Strategic Development Area, which has no named developer interest, additional sites should be allocated to augment the housing land
supply (to include candidate site LDP WDY001). Windygates provides a deliverable, opportunity for housing to contribute towards the effective land supply shortfall.

**Modifications sought by those submitting representations:**

**Glenrothes and Ore and Upper Leven Valley Area Strategy**

Taylor Wimpey (1344): Allocate site

Persimmon Homes (1963): Lochgelly SDA should be removed and these units reallocated to more marketable locations.

Miller Homes East Scotland Ltd (2337): Crossgates should be part of the Glenrothes, Ore And Upper Leven Valley Area Strategy.

Episo Boxes GP (3723): Remove the final two sentences from paragraph 44.

**Kirkcaldy Area Strategy**

Raith Developments Limited (1359): The term ‘Strategic Development Areas’ should be changed to ‘Strategic Land Allocations’.

Elizabeth Dryburgh (1202): The promoted cross-Forth transport link should not be a hovercraft.

**Levenmouth Area Strategy**

Scottish Enterprise (1061): Include text on the benefits and necessity of the Leven Link Road project (policy LVA002) in the policy section on Levenmouth Strategic Development Area and cross reference to employment sites within the docks area and the Fife Energy Park.

The Thornton to Leven rail link should be more clearly indicated on the plan. Include text regarding delivering these improvements in the plan and the Supplementary Guidance on Planning Obligations.

The William Brown Trust (2105): allocate additional housing sites to support Levenmouth Strategic development area (specifically candidate site LDP WDY001).

**Summary of responses (including reasons) by planning authority:**

**Glenrothes and Ore and Upper Leven Valley Area Strategy**

Glenrothes Area Futures Group (1314): Comments noted

Taylor Wimpey (1344): The Proposed Local Development Plan (CD5) allocates land for housing across the Kirkcaldy, Glenrothes & Central Fife Housing Market Area, sufficient to meet statutory requirements.

Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with under the Homes Schedule 4 (2B) and its associated
supporting paper. All sites identified for housing development in the Proposed Local Development Plan have been the subject of site assessments.

The site does not integrate well with the existing settlement due to the railway embankment. No vehicular access is available through the railway embankment and access to the site would have to be taken from David Douglas Avenue. The site has a history of flooding and there are built heritage concerns with regards to development on this site due to prehistoric crop marks & pit alignments on site. This site is underlain by coal and prior extraction of coal should be facilitated and encouraged for any substantial new development sites, in line with national policy aimed at preventing sterilisations of coal. In response to comments about effectiveness of sites in the housing supply, there is already a large scale housing site allocated in Markinch that meets the tests of effectiveness as set out in Planning Advice Note 2/2010 Affordable Housing and Housing Land Audits (CD10).

Brian Sheerins (1577): Support for the strategy for this area is noted.

Persimmon Homes (1963): SESplan (CD2) has set the Ore/Upper Leven Valley as a Strategic development Area. The settlements of Kelty Cowdenbeath and Lochgelly are located within this area; therefore allocating land in these settlements complies with the SESplan strategy.

Miller Homes East Scotland Ltd (2337): Crossgates is not mentioned in this context as it does not form part of the Ore/Upper Leven Valley Area as it is located south of the A92.

Episo Boxes GP (3723): Comments noted. Fife Council considers that there is merit in removing the last 2 sentences of paragraph 44 and replacing them with the following text so that it corresponds with the text in Figure 6.4 (B):

“The Council will explore the potential for comprehensive redevelopment of this centre if the retail uses can be successfully relocated to the town centre or edge of centre”

Fife Council invites the Reporter to make an appropriate recommendation on this issue.

Kirkcaldy Area Strategy

Raith Developments Limited (1359): The last Fife Structure Plan (2006-2026) identified seven Strategic Land Allocations across Fife. Both subsequent Strategic Development Plans covering Fife (TAYplan and SESplan) retain these allocations. TAYplan refers to these existing allocations as ‘Strategic Development Areas’ whilst SESplan refers to the existing allocations as ‘Strategic Land Allocations’ and augments them with two additional ‘Strategic Development Areas’ (North Dunfermline and Ore and Upper Leven Valley). Fife Council decided that for consistency it was not appropriate to use different terminology for the existing and additional large scale strategic allocations within the area. It has therefore chosen to refer to all these allocations as ‘Strategic Development Areas’ as this reflects terms used in both TAYplan and SESplan.

Elizabeth Drysdale (1202): The support for a cross-Forth transport link and concerns regarding the potential impact of a hovercraft link by are noted. The nature and location of the link is not yet determined and the impact of any proposal on the amenity of nearby communities would be considered in detail through the planning application process. Policies 1 and 10 in FIFEplan provide the context for addressing impacts on amenity.
**Levenmouth Area Strategy**

Scottish Enterprise (1061): Issues relating to the Levenmouth Link Road and the Thornton to Leven rail link are addressed in the Issue 14 schedule 4.

Wemyss Estate Trustees (2108): Comments are noted.

The William Brown Trust (2105): Issues relating to the Levenmouth Strategic Development Area and the allocation of additional, smaller housing sites are addressed in Issue 14.

**Reporter’s conclusions:**

**GLENROTHES AND THE ORE & UPPER LEVEN VALLEY AREA STRATEGY**

**Barnslee, Markinch**

1. The status of this site is considered under Issue 12, Glenrothes Area, as the determining factors involve both local and strategic considerations. It is concluded under Issue 12 that there should be no modification in respect of this representation.

**Location of Special Development Areas at Kelty, Cowdenbeath and Lochgelly**

2. Local development plans are required to be consistent with strategic development plans. In respect of Kelty, Cowdenbeath and Lochgelly the relevant strategic document is SESplan, approved June 2013. SESplan identifies two Strategic Development Areas within the boundaries of the proposed Fife Local Development Plan: North Dunfermline and the Ore/Upper Leven Valley which extends from Cowdenbeath eastwards via Kelty and Lochgelly to Glenrothes as illustrated in Figure 1, The Spatial Strategy. SESplan Policy 1A requires local development plans to direct further strategic development to both these Strategic Development Areas. The focus of development in these and other Strategic Development Areas is confirmed in the SESplan Supplementary Guidance, Housing Land, approved May 2014.

3. On the foregoing basis, despite the concerns expressed by Persimmon Homes in respect of marketability, the proposed plan allocates development, particularly housing land, on sites within the Ore/Upper Leven Valley Strategic Development Area including Cowdenbeath, Kelty and Lochgelly. I conclude that this is a requirement, justified in terms of the necessity of the proposed plan to be consistent with SESplan. In turn, I conclude that the proposed plan should not be modified in this respect.

**Crossgates**

4. As explained by the council, Crossgates is not contained within the area of the Glenrothes, the Ore and Upper Leven Valley Area Strategy. Indeed, SESplan defines the strategy area as lying to the north and west of the A92. On this basis it would be inappropriate to include a reference to Crossgates as requested. I have considered whether a reference could be made elsewhere in the proposed plan but Crossgates does not fall within an area identified in the Spatial Strategy chapter. In turn, I do not consider that a specific reference is either justified or required.
5. Although a further specific reference to Crossgates and the potential use of the park-and-ride facility at Halbeath has also been suggested, the council has emphasised that an appropriate reference is included at paragraph 37 in the Dunfermline section of the Fife Spatial Strategy chapter. I accept the succinct reference to the park-and-ride facility accords with the approach adopted in the Spatial Strategy chapter and that this is suited to inclusion within the Dunfermline Area Strategy section of the chapter. No further reference to the park-and-ride facility should be included.

EPISO Boxes

6. The Saltire Centre, Glenrothes is recognised as a commercial centre in Figure 6.4(B) (under the “Saltire Retail Park”). Representations in this respect are considered under Issue 2(e), Town Centres. The final paragraph of the guidance for the Saltire Retail Park is recommended for modification to:

“Should the opportunity arise, the council will explore the potential for comprehensive redevelopment of the centre if the retail uses can be successfully relocated to the town centre or edge-of-centre.”

7. I believe the foregoing modification explains the council’s wider objective in the local context of the Saltire Retail Park. In turn, it is not necessary to repeat this more local guidance in the strategic context of paragraph 44. Accordingly, the final two sentences of paragraph 44 should be deleted. As explained, the remaining sentence expresses the council’s strategic desire to increase retail and leisure provision within the town centre. This is reflected in the more detailed advice in respect of the Saltire Retail Park

KIRKCALDY AREA STRATEGY

Cross-Forth transport link

8. The strategy continues to safeguard the development of a cross-Forth link between Kirkcaldy and Edinburgh should there be any progress in this respect. No further details are included in paragraph 49 of the proposed plan. However, Figure 53, Spatial Strategy, includes a reference to “Hovercraft Link” and SESplan, the strategic planning document, refers to “Cross Forth Hovercraft/Ferry”.

9. I can appreciate concern about noise should a link be proposed using hovercraft, this mode of transport being referred to in both the strategic and local development plans. However, Policy 1, Development Principles, protects the amenity of the local community. Additionally, Policy 10, Amenity, requires development proposals to demonstrate they will not lead to a significant detrimental impact on amenity including by means of noise pollution and other nuisances.

10. The concept of a cross-Forth link has not been questioned and I consider the relevant local development plan policies would provide the basis for development management no matter the method proposed for any future crossing project. Accordingly, no change to the proposed plan is required.

Terminology

11. SESplan designates thirteen strategic development areas of which two are within Fife. These are North Dunfermline and the Ore/Upper Leven Valley. The current Mid
Fife Local Plan contains a number of strategic land allocations, including Kirkcaldy East, which reflect areas for development allocated in the Fife Structure Plan 2006-2026 (the predecessor of SESplan) with a minimum of 300 houses.

12. The proposed plan includes a number of strategic development areas in addition to the two areas in Fife designated in SESplan. These are shown in Figure S3 - Spatial Strategy as Kirkcaldy SDA, Levenmouth SDA, Cupar SDA and St Andrews SDA (Cupar and St Andrews being within the TAYplan area). Lochgelly SDA, Dunfermline SDA, Glenrothes Regeneration and Ore and Upper Leven Valley growth area are also shown but are within the SESplan strategic development areas. The proposed plan explains “Kirkcaldy is the location for two Strategic Development Areas.”

13. SESplan recognises that a large number of new houses are already allocated in Fife, referring (at paragraph 61) to Dunfermline, Lochgelly, South West, Kirkcaldy, Levenmouth and Glenrothes/Markinch. These allocations are described as strategic land allocations.

14. I note the intention of the council to achieve consistency in the proposed plan by replacing the term strategic land allocation with strategic development area. However, Raith Developments claims that this wider use of the term causes confusion.

15. In my opinion, SESplan is clear in its designation of thirteen strategic development areas, two of which are in Fife, and the purpose behind the allocations. I agree that the identification of further “strategic development areas” in the proposed plan is therefore confusing. Whilst the council believes there is consistency in nomenclature, I consider that the application of the term strategic development area beyond the locations identified in SESplan represents inconsistency between the content of the strategic plan and the local development plan.

16. To resolve this situation, in that part of the proposed plan within the SESplan area, references to strategic development areas beyond those identified in SESplan should be altered. In my opinion it would be appropriate to revert to strategic land allocation as this reflects the terminology in the Mid Fife and the Dunfermline and West Fife Local Plans and which, in turn, is referred to in SESplan.

17. The strategic development areas at Cupar and St Andrews reflect the terminology in TAYplan and therefore represent consistency between the two elements of the development plan. Accordingly, it is appropriate to retain the reference to strategic development areas at both these locations. In the Fife Spatial Strategy chapter, paragraph 54, the Cupar North Strategic Development Area is clearly shown to relate to TAYplan. In paragraph 60, the strategic development area at St Andrews is not directly linked to TAYplan and it would be preferable if a clear relationship were to be indicated between the strategic plan and the proposed plan.

LEVENMOUTH AREA STRATEGY

Levenmouth link road and Thornton to Leven rail link

18. The Spatial Strategy chapter deals with strategic topics and area strategies in a succinct manner. More detailed consideration of issues, including the Levenmouth link road and Thornton to Leven rail link, is found under Issue 14.
19. On the above basis, I believe that the Levenmouth Area Strategy, paragraph 51, makes adequate reference to the rail link. The link is also shown indicatively in Figure S3, Spatial Strategy. This is appropriate for the scale and nature of the diagram.

20. Although there is reference to a forthcoming investigation into road access in paragraph 50, the Levenmouth link road is not specified. An appropriate reference should therefore be included. As indicated, more detailed matters should be considered under the assessment of Proposal LVA 002. Figure S3 is not of a large enough scale to incorporate a meaningful line of the link road, even indicatively. Under Issue 14, the council considers that there is merit in giving a clearer indication of the link road on the proposed plan map base. Improvements to the graphic representation of the link road on the Proposals Map and the Inset Map for Leven, Buckhaven, Methil, Methilhill, Kennoway, Windygates, Bonnybank and Baintown could be made by the council without formal modification.

**Insufficient deliverable housing sites**

21. Although the William Brown Trust objects to the Levenmouth Area strategy, the representation concerns the lack of deliverable sites to support what is described as the “main SDA site” (see Issue 14) which I assume is site LVA 001, Sea Road, Muiredge, Percival Road. However, this argument is not presented in any detail and the claim appears to be intended to justify the allocation of additional housing sites, in particular, candidate site LDP-WDY001, at Leven Road, Windygates. Site LDP-WDY001, is examined under Issue 14.

22. There being no objection to the central thrust of the strategy, I conclude that there should be no change to the Levenmouth Area Strategy in the light of this representation.

**Reporter's recommendations:**

I recommend that the following modifications be made:

1. On page 15 of the proposed plan, delete the final two sentences of paragraph 44 commencing “The location of the Saltire Centre does not fit well ....”

2. On page 15 of the proposed plan modify the third sentence of paragraph 50 as follows:

   “Road access (the Levenmouth Link Road) from the energy cluster ....”

3. Throughout the proposed plan amend references to “strategic development areas” where these areas do not relate directly to the “strategic development areas” in SESplan to “strategic land allocations”; for instance, paragraph 47 on page 15 should read: “Kirkcaldy is the location for two strategic land allocations ....” whilst paragraph 54 should remain unchanged.

4. On page 16 of the proposed plan, amend paragraph 60 to read:

   “Under the provisions of TAYplan, St Andrews has a strategic development area to the west of the town ....”. 
**Issue 3d**

**East Fife Area Strategies**

| Development plan reference: | Fife Spatial Strategy, Pages 16 and 17 | Reporter: Dilwyn Thomas |

**Body or person(s) submitting a representation raising the issue (including reference number):**

**Cupar and Howe of Fife Area**
- Cupar North Partnership (1366)
- Allan Brown (1427)
- David Kirk (1500)
- Persimmon Homes (East Scotland) (1964)
- Lundin Homes (2060)
- A & J Stephen Ltd (2157)
- J G Lang & Son (2177)
- Springfield Community Council (2213)
- CALA Management Ltd and W B Bayne & Son (2214, 2216, 2224)
- Elspeth Smith (2302)
- Gladman Developments Ltd (2764)

**St Andrews Area**
- Kingdom Housing Association (1175)
- Jane A Liston (1764)
- Headon Developments Ltd (1881)
- Landvest PCC Ltd (1919)
- Lundin Homes (2065)
- Linlathen Developments (Tayside) Limited (2125)
- A & J Stephen Ltd (2159)
- John Picton (2742)
- P M Uprichard (2779)
- Confederation of St Andrews Residents’ Associations (3686)
- Avant Homes (3698)

**East Neuk Area**
- Kingdom Housing Association (1173)
- Landvest PCC Ltd (1915)
- P Brignal (3869)

**Taybridgehead Area**
- Linlathen Developments (Tayside) Limited (2127)
- Mr and Mrs Finlay (3874)

**Provision of the development plan to which the issue relates:**

Cupar & Howe of Fife Area, East Neuk Area, St Andrews Area and Tay Bridgehead Area Spatial Strategies

**Planning authority’s summary of the representation(s):**

**Cupar & Howe of Fife Area Strategy**

Allan Brown (1427) and Elspeth Smith (2302) question the scale of the housing development for Cupar North Strategic Development Area required by the FIFEplan strategy, and considers that there are opportunities for infill development in the town which would not swamp the town and destroy its setting. Mr Brown also wonders where new residents will work, and questions whether the they will just add to the commuters going to Glenrothes, St Andrews and Dundee.

David Kirk (1500) expresses support for the principle of the Cupar North Strategic Development Area, pointing to the TAYplan Housing Need and Demand Study’s identification of the scale of unmet housing need in the Cupar Housing Market Area and indicating his view that Cupar North provides the best available site for housebuilding on the scale and tenure-mix now required. In strategic transportation terms, however, Mr
Kirk is unhappy with the construction strategy of the Cupar North Relief Road, stating that the road is more than just an access road for Cupar North and is in fact an upgrade to the A91 which combines with the proposed employment and housing sites in the FIFEplan to enhance the economic potential of NE Fife. This being the case, it is unacceptable for the relief road to be built in phases matched to housing completions, suggesting that the road may have to be partly public sector financed to deliver it within a reasonable timeframe.

A & J Stephen Ltd (2157) and J G Lang & Son (2177) questions the economic viability of that part of the Cupar North Strategic Development Area lying north of the A91, relying as it does on the provision of a relief road and the suppression of alternative development opportunities which are deemed to compete with Cupar North. It is A&J Stephen’s view that, whilst its own Gilliesfaulds development can be delivered, FIFEplan over-relies on the delivery of the SDA’s and the identification of additional and/or alternative deliverable supply in appropriate settlements does not compromise the Proposed Plan strategy of SDA’s but allows for the timeous implementation of the TAYplan housing requirement. JG Lang & Son are in agreement with this, and suggest a site at Springfield South as a well-located site suitable to augment the housing land supply. The Springfield Community Council (2213), however, provides evidence gathered by local survey (attached to the representation) which indicates a majority of survey respondents oppose development at Springfield South.

CALA Management Ltd and W B Bayne & Son (2214, 2216 & 2224) is of the view that the promotion of Cupar North on its own will fail to deliver the requisite number of homes in the required timeframe. Cites local, regional and national policy as requiring a flexible approach to the allocation of a generous supply of land to provide a range and mix of houses but sees reliance solely on Cupar North as being overly restrictive and unable to provide the numbers of new homes required by 2024. Considers that FIFEplan’s objective of ensuring that its policies act as a catalyst for future increases in housebuilding to meet land supply targets is laudable, but is not supported by credible and effective housing land allocations, and so alternative sites must be allocated to deliver homes in the short-medium term. Considers that promoting sites such as that at Ferryfield (anticipated to have a three-year construction and sales life cycle) will allow short-term needs to be met, in a suitable location, and suggests that Cupar North would feed off the positivity created by the development of up to 100 new homes. The company believes that the Strategic Development Area should be altered to become a Cupar Strategic Development Area.

Lundin Homes (2060) suggests that, in order to lay the foundation for FIFEplan to meet the TAYplan housing land requirement at the rates identified, it is imperative that FIFEplan allocates additional sites across a much broader range of settlements within the Cupar and NW Fife HMA and the St Andrews and NE Fife HMA. Lundin Homes considers that the situation in the Cupar and NW Fife HMA, which is heavily dependent on a single extended site at Cupar North SDA, is particularly alarming given ongoing difficulties in financing the infrastructure costs associated with the link road as well as contributions towards education and drainage etc., to which burden the Proposed FIFEplan Planning Obligations SG will only add further. It is clear that significant public sector support will be necessary in order to make Cupar North work and given the current state of public sector finances this is unlikely to emerge. Lundin Homes put forward sites at Ceres and Kilconquhar as alternatives offering prime potential to assist in meeting the TAYplan delivery targets under FIFEplan.
Whilst recognising that large allocations can have an important role in meeting the housing land requirement and can bring inherent benefits to local communities, Gladman Developments Ltd (2764) states that national planning policy is clear that the timely delivery of homes is key to economic recovery and growth and local planning authorities should look to provide a greater mix of smaller, effective housing sites that are deliverable in the short term in order to effectively plan for growth. In this context, Gladman recommend a site at East and West Back Dykes in Strathmiglo as a suitable candidate to contribute to this aim.

The Cupar North Partnership (1366) considers that the continued identification of CUP 001 as articulated within the proposed FIFEplan is necessary for FIFEplan to accord with TAYplan. The strategy of not allocating any land which could undermine the delivery of Cupar North is also necessary and must continue, a point also specifically made by Persimmon Homes (East Scotland) (1964). The Partnership indicates that good progress is being made to deliver Cupar North, which shouldn’t be undermined by any deviation from the strategic or area spatial strategy, as required by TAYplan and as articulated within the proposed FIFEplan.

**East Neuk Area Strategy**

Kingdom Housing (1173): Kingdom Housing Association requests that The Fife Spatial Strategy be modified by adding the following sentence to the end of Paragraph 64 – “In particular, the potential of Largoward to accommodate appropriate growth will be examined.” to reflect that Fife Council has acknowledged Largoward’s potential, and confirmed that it will be examined through the East Neuk Community Action Plan. It would be clearer to policy makers, potential investors, and the local community. The modification does not imply any specific action arising from such consideration, and therefore poses no prejudice to the current Fifeplan strategy or to ENCAP’s deliberations.

Landvest PCC Ltd (1915) indicate that Crail Airfield is available for residential development in the event that there is an emerging housing land shortfall, and express doubt as to whether the St Andrews West Strategic Land Allocation and its strategic infrastructure requirements will ever be a viable development. It is considered that Crail Airfield is a significant brownfield site, which should form part of the East Neuk Area strategy, including providing for the housing growth requirements of the area.

Paul Brignal (3869) expresses concern regarding a conflict of interest, whereby the East Neuk Community Action Plan group (ENCAP), which is made up of the six landowners who own much of the land in the East Neuk, appears to be setting the council's planning strategy for the next thirty years. Mr Brignal also considers that the whole of East Neuk needs some form of protection from development, citing a charm and character that compares with the Welsh Pembrokeshire Coast National Park.

**St Andrews Area Strategy**

Kingdom Housing (1175): Kingdom Housing Association requests that the Fife Spatial Strategy be modified to reflect the need to address longer-term housing pressures generated by the continued development of St Andrews University through future iterations of the Local Development Plan. The justification for this is to be found within the conclusions of the St Andrews Centre for Housing Research’s report ‘Growing Economies & Building Homes – Reconciling Growth & Housing Wellbeing in St Andrews’
of December 2013, (attached to the representation). Kingdom Housing Association regards the preferred strategy for St Andrews as inadequate. The Association supports the CHR recommendation that a substantial additional housing allocation be made to serve the town and university, although whether that should be in the form of a 'neighbourhood' can only be determined after further study. It is unrealistic to imagine that it can be accommodated on the fringes of the town, given green belt designation. Guardbridge and Largoward have the potential to contribute. The strategy separation in the Local Development Plan of St Andrews from the East Neuk and the Tay Bridgehead areas is not helpful in that respect.

Jane A Liston (1764) objects to the non-inclusion of the St Andrews Rail Link (Starlink) in the Proposed Plan and provides supporting information highlighting the assessments and viability studies that have been carried out in support of the proposal.

Lundin Homes (2065) repeat the comments made under the Cupar & Howe of Fife Area section above (2060), which contend that there is an overreliance on SDAs and delivery failure in the area will result in a shortfall in housing. Additional sites at Ceres and Kilconquhar should be identified to make up this deficiency. This is as an alternative to Doves Loan which should be removed from the plan as it is ineffective.

Landvest PCC Ltd (1919) indicate that Crail Airfield is available for residential development in the event that there is an emerging housing land shortfall, and express doubt as to whether the St Andrews West Strategic Land Allocation and its strategic infrastructure requirements will ever be a viable development.

Headon Development Ltd (1881): Support the continued inclusion of the Strategic Development Area to the west of St Andrews in its current form, which conforms with TAYplan. The plan must continue to resist other sites that would undermine the delivery of the Strategic Development Area.

A & J Stephen Ltd (2159): Doubt viability of the St Andrews West allocation. Other than statements of intent, there has been no progress on site. The Housing Land Audit 2013 states that of the 1,090 units allocated at St Andrews West. The first 20 completions are programmed at an ambitious 2016 delivery and with only 40 units per annum for the next 3 years, 950 units are programmed post 2020. With no PAN or other planning activity activated for the site, it will simply not deliver the required rate of development of 100 units per annum envisaged through the current and emerging plans.

Linlathen Developments (Tayside) Ltd (2125): Doubt viability of the St Andrews West allocation. Other than statements of intent, there has been no progress on site. It is considered that additional housing sites should be identified in the St Andrews area to contribute to the housing land supply in this market area having regard to an emerging housing shortfall.

John Picton (2742) and P M Uprichard (2779): Developments that have happened since 1996 have seriously damaged the historic centre of St Andrews and the Local Development Plan cannot be relied upon to protect the historic centre.

P M Uprichard (2779), Confederation of St Andrews Residents Associations (3686) consider that development of the new secondary school at Pipeland and other recent planning approvals will open up the green belt for development.
Avant Homes (3698) expresses support for the strategy of the St Andrews area and the inclusion of the housing site at Bonfield Road, Strathkiness.

Confederation of St Andrews Residents Associations (3686): Potential for development creep from new sites such as the current Madras school sites, intensification of existing consents and windfall sites. This will reduce the viability of the adopted Local Plan allocations and would be in excess of assessed need. The report of the St Andrews Town Commission on Housing should inform policy for meeting the unique needs for family and student housing need in the town.

Confederation of St Andrews Residents Associations (3686): Concern over impact on roads and road traffic emissions, and the impact this may have on health. Concern over impact on services and other infrastructure.

Confederation of St Andrews Residents Associations (3686): The non-identification of Station Park for development is strongly supported as this is an important public asset. In order to provide a secure future for this facility as an inalienable public asset for public sporting events and fixtures, it should be identified for such use in the Plan.

Confederation of St Andrews Residents Associations (3686): The western part of the North Haugh is considered suitable for future educational development, together with the use proposed in the Adopted Local Plan for seasonal park and ride use.

Tay Bridgehead Area Strategy

Linlathen Developments (Tayside) Ltd (2127) notes that the strategy for the Tay Bridgehead Area identifies Newport, Wormit, Tayport, Leuchars, and Guardbridge as the best options for locating development due to their accessibility to the wider region and the services available. Linlathen Developments considers that there should be an additional allocation of housing land at Wormit, as a location that conforms to the Tay Bridgehead Area strategy and where there is also an emerging housing shortfall in the market area.

Mr and Mrs Finlay (3874) object to the Strategy for Tayport, which is to identify only minimal housing sites in Tayport, indicating that existing Local Plan sites have not come forward for development need to be critically assessed and either removed from the Proposed Plan or reassessed to factor a more realistic contribution towards the Council’s effective housing land supply calculations. Mr & Mrs Finlay highlight existing sites where anticipated delivery is slow and contend that these sites should not be relied upon to the exclusion of new sites which can deliver units much earlier. Mr and Mrs Finlay also consider that the strategy for the Tay Bridgehead area conflicts with Scottish Planning Policy, and the Strategy of the FIFEplan itself, with regard to the requirement to provide a continuous five year land supply.

Modifications sought by those submitting representations:

Cupar & Howe of Fife Area Strategy

Allan Brown (1427), Elspeth Smith (2302), A & J Stephen Ltd. (2157) and J G Lang & Son (2177): Reduce the scale of the Cupar North Strategic Development Area and introduce more infill sites in Cupar to make up the shortfall in housing numbers.
Allan Brown (1427): Cupar North development should also provide employment opportunities.

J G Lang & Son (2177): Seeks the inclusion of a site at Springfield South for housing. The Springfield Community Council (2213): No modifications requested; support for FIFEplan position on site at Springfield being promoted by JG Lang & Son.

David Kirk (1500): Seeks an amendment to the Plan to indicate that the Cupar North relief road should not be built in phases, and that public sector funding should be used if required to deliver the road within a reasonable timeframe.

CALA Management Ltd and W B Bayne & Son (2214, 2216 & 2224): Seeks the inclusion of a site at Ferryfield, Cupar for housing and a reduction of the reliance on Cupar North Strategic Development Area alone to provide the housing land supply for the strategy area. Seeks a redefinition of the Cupar North Strategic Development Area to become a Cupar Strategic Development Area.

Lundin Homes (2060): Seeks the inclusion of sites at Ceres and Kilconquhar for housing and a reduction of the reliance on Cupar North Strategic Development Area alone to provide the housing land supply for the strategy area.

Gladman Developments Ltd (2764): Seeks the inclusion of a site at East and West Back Dykes, Strathmiglo for housing and a reduction of the reliance on Cupar North Strategic Development Area alone to provide the housing land supply for the strategy area.

The Cupar North Partnership (1366) and Persimmon Homes (East Scotland) (1964): No modifications requested; both support the area strategy of concentration on Cupar North Strategic Development Area and the restriction of other housing opportunities elsewhere in the Housing Market Area to protect the strategy.

**East Neuk Area Strategy**

Kingdom Housing (1173): Add the following sentence to the end of Paragraph 64 – “In particular, the potential of Largoward to accommodate appropriate growth will be examined.”

Landvest PCC Ltd (1915): Crail Airfield should form part of the East Neuk Area strategy.

Paul Brignal (3869): Designation of the whole of the East Neuk with a status that provides some form of protection from development, such as a National Park.

**St Andrews Area Strategy**

Kingdom Housing (1175): Amend the Fife Spatial Strategy by adding the following sentence to the end of Paragraph 59 – “Notwithstanding this, the longer-term housing pressures generated by the continued development of St Andrews University will require specific attention in future iterations of this Plan.”

Jane A Liston (1764): Inclusion of the St Andrews Rail Link (Starlink) in the Proposed Plan as a key part of the St Andrews strategy.

Lundin Homes (2065): Inclusion of sites at Greenside, Ceres and 2 sites in Kilconquhar,
all for housing, to make up a shortfall in housing across the strategy area.

Headon Development Ltd (1881): No change requested.

Landvest PCC Ltd (1919): Address the shortfall which will arise due to the delayed delivery of St Andrews SDA.

Linlathen Developments (Tayside) Ltd (2125): Additional housing sites should be identified in the St Andrews area.

A & J Stephen Ltd (2159): Identify additional and/or alternative deliverable housing land.

John Picton (2742) and P M Uprichard (2779): Local Development Plan needs strengthened in respect of protecting the historic centre of St Andrews.

P M Uprichard (2779), Confederation of St Andrews Residents Associations (3686): Local Development Plan must provide a robust Green Belt for the town.

Avant Homes (3698): No modifications requested; agrees with the St Andrews Area strategy and the inclusion of the site for housing at Bonfield Road, Strathkinness.

Confederation of St Andrews Residents Associations (3686): Control new development in St Andrews and the surrounding area, based on the identified needs of the town and the potential impacts of new development.

Confederation of St Andrews Residents Associations (3686): Station Park should be identified in the plan for sports use.

Confederation of St Andrews Residents Associations (3686): Retain the western part of the North Haugh for future educational development.

Tay Bridgehead Area Strategy

Linlathen Developments (Tayside) Ltd (2127): Allocate additional housing land at Wormit.

Mr and Mrs Finlay (3874): Allocate additional housing land at Tayport.

Summary of responses (including reasons) by planning authority:

Cupar & Howe of Fife Area Strategy

Allan Brown (1427), David Kirk (1500), Elspeth Smith (2302), A & J Stephen Ltd. (2157), J G Lang & Son (2177), The Springfield Community Council (2213), CALA Management Ltd and W B Bayne & Son (2214, 2216 & 2224), Lundin Homes (2060), Gladman Developments Ltd (2764), The Cupar North Partnership (1366) and Persimmon Homes (East Scotland) (1964): Comments on the housing land supply are noted. The housing land supply position is detailed in Issue 2b – Homes.

Allan Brown (1427): Employment provision remains a priority for Fife Council and is an integral part of the Development Plan. This is exemplified by the inclusion within Cupar
North of land for a small business park, bulky goods retail area in addition to serviced employment land providing within the development area, space for general industry or storage and distribution uses. FIFEplan is supported by an Employment Land Strategy which aims to ensure the provision of land and infrastructure to attract jobs and inward investment.

David Kirk (1500): In considering proposals for major growth, Fife Council must be satisfied that the proposal made is deliverable and that no undue burden will be placed on the public purse. In this respect it is normal practice for all major planning applications to be accompanied by a form of legal agreement securing the grant of planning permission to the land not to the individual developer/s in question. In this respect it is also common for guarantees by way of bonds or similar to be requested ensuring that the provision of major infrastructure such as a relief road is not left unfinished. A definitive approach will be agreed in considering planning applications.

East Neuk Area Strategy

Kingdom Housing (1173): Kingdom Housing Association have requested additional wording to the strategy to recognise that the potential of Largoward to accommodate appropriate growth will be examined through the ENCAP process. Whilst this would be consistent with the text set out in the settlement plan for Largoward (page 125 of the Proposed Plan), it is not considered appropriate to refer to the approach for Largoward specifically in the strategy section of the plan, which is higher level in content.

Landvest PCC Ltd (1915): The housing land supply position is detailed in Issue 2b – Homes. It is not considered appropriate to refer to proposals for Crail Airfield specifically in the strategy section of the plan, which is higher level in content. See also Issue 15b East Neuk Area (Crail) in relation to proposals for Crail Airfield.

Paul Brignal (3869): Fife Council is working in partnership with local landowners, the community councils, and local residents as part of the East Neuk Community Action Plan project. Fife Council, however, retains the governance over what land use proposals will be promoted through the Local Development Plan (in current and future iterations). As regards the setting up of a National Park Authority, or similar, for the East Neuk of Fife, the East Neuk Community Action Plan project is a more appropriate scale and type of enterprise.

St Andrews Area Strategy

Kingdom Housing (1175): The ‘Growing Economies And Building Homes: Reconciling Growth And Housing Wellbeing In St Andrews’ (2013) study commissioned to the Centre for Housing Research by Fife Council and the University of St Andrews has informed the proposals set out in the plan and is likely to continue to inform future iterations of the plan. Matters of student accommodation and HMO provision are addressed in Issue 2B Homes. Issues relating to housing land are also dealt with under Issue 2B Homes. The proposals for St Andrews, Guardbridge and Largoward are set out in Issue 16 St Andrews Area, Issue 20 Tay Bridgehead Area, and Issue 15a East Neuk Area, respectively. Fife Council recognises that there will be an overlap in issues affecting different strategy areas, and has taken this into consideration in the preparation of the plan.

Jane A Liston (1764): Whilst Ms Liston’s response lists various studies supporting the
The proposal is not included in TAYplan as a key piece of strategic infrastructure. Also, the proposal is not currently on Transport Scotland’s list of priorities and for it to be considered for inclusion in the LDP a STAG appraisal would need to be carried out. The strategy of the Council is to promote better public transport connections from St Andrews to Leuchars through enhanced bus provision and encourage use of the train by improving car parking facilities at Leuchars station, included in proposal LWD 013.

Lundin Homes (2065): Comments noted. The housing land supply position is detailed in Issue 2b – Homes.

Landvest PCC Ltd (1919): Comments on the housing land supply are noted. The housing land supply position is detailed in Issue 2b – Homes.

Linlathen Developments (Tayside) Ltd (2125): Comments noted. The housing land supply position is detailed in Issue 2b – Homes. The issue of allocating additional land at the St Andrews area is addressed in Issue 16 – St Andrews Area.

A & J Stephen Ltd (2159): Comments noted. The housing land supply position is detailed in Issue 2b – Homes. The issue of allocating additional sites in the St Andrews area is addressed in Issue 16 – St Andrews Area.

Headon Development Ltd (1881): Support for the continuation of the strategy to support the St Andrews West Strategic Development Area is noted.

Avant Homes (3698): Support noted for the strategy of the St Andrews area and the inclusion of the housing site at Bonfield Road, Strathkiness.

John Picton (2742), Confederation of St Andrews Residents Associations (3686) and P M Uprichard (2779): The St Andrews Area Strategy is considered to be appropriate in highlighting the importance of protecting the historic centre of the town and the town’s setting through its green belt. Development proposals will be considered against the provisions of Policy 14 ‘Built and Historic Environment’ and Policy 9 ‘Green Belt’. Issues relating to these policies are addressed under Issue 2H: Built and Historic Environment and Issue 2F: Countryside. Issues relating to the proposed new High School at Pipeland Farm’ and related education issues are addressed under “Proposal STA 013” in Issue 16: St Andrews Area.

Confederation of St Andrews Residents Associations (3686): The strategy and Settlement Plan for St Andrews in the Proposed Local Development Plan represents a continuation of the strategies set out in the adopted St Andrews and East Fife Local Plan (2012) and the adopted TAYplan Strategic Development Plan (2012). The Proposed Local Development Plan carries forward proposals to focus development to the west of the town through the St Andrews West Strategic Development Area (proposal STA 001).

The level of growth proposed for St Andrews is considered to be appropriate to its identification as a Tier 2 principal settlement in TAYplan Strategic Development Plan.

Potential development opportunities have been added to reflect the potential for brownfield sites within the town at the existing Madras College sites on South Street and at Kilrymont, as a result of Fife Council’s intention to build a new single campus school at Pipeland Farm (proposal STA 013), as well as smaller-scale opportunities at West
Sands and the Botanic Gardens intended to support the role of these existing attractions.

Housing need for the St Andrews and North East Fife Housing Market Area has been assessed through the TAYplan-wide Housing Need and Demand Assessment (2010) that informed the housing requirement for the housing market area in the Strategic Development Plan. More detailed local assessment of housing issues relating to St Andrews specifically, include the ‘Growing Economies and Building Homes: Reconciling Growth And Housing Wellbeing In St Andrews’ (2013) study commissioned to CHR by Fife Council and the University of St Andrews, which considered the relationship of the university’s student population and the town's housing market. These studies have informed the proposals set out in the plan. Matters of student accommodation and housing need are addressed in Issue 2B Homes.

Confederation of St Andrews Residents Associations (3686): Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision.

Confederation of St Andrews Residents Associations (3686): Fife Council considers Station Park playing fields to be an important open space on one of the main approaches to the town. There is no proposal to change the designation of Station Park as protected open space.

Confederation of St Andrews Residents Associations (3686): The North Haugh forms part of the St Andrews West Strategic Development Area. Issues relating to the Strategic Development Area are addressed under Proposal STA 001 in Issue 16: St Andrews Area.

The comments from CSARA requested retention of land at the North Haugh for education purposes are set within the context of proposals for a replacement Madras school. Fife Council has approved planning applications (planning applications 13/02583/EIA and 14/02249/ARC), subject to legal challenge, for a new replacement Madras secondary school at Pipeland Farm (proposal STA 013 in the Proposed Local Development Plan). It is therefore no longer considered necessary to identify a potential site for a new secondary school at the North Haugh.

**Tay Bridgehead Area Strategy**

Linlathen Developments (Tayside) Ltd (2127) and Mr and Mrs Finlay (3874): Comments noted. The housing land supply position is detailed in Issue 2b – Homes. The issue of allocating additional land at Wormit is addressed in Issue 20 – Tay Bridgehead Area.

Mr and Mrs Finlay (3874): The strategy for the Tay bridgehead (paragraphs 57-59 of the Proposed Plan) identifies Newport, Wormit, Tayport, Leuchars and Guardbridge as the settlements within that area that are the best options for development due to their relative accessibility and proximity to services. The housing land supply position is detailed in Issue 2b – Homes. The issue of allocating additional land at Tayport is addressed in Issue 20 – Tay Bridgehead Area.
Reporters conclusions:

1. The Cupar & Howe of Fife Area Strategy in the proposed plan highlights that the Cupar North Strategic Development Area is an established strategic proposal, and that new development proposals are not supported in close proximity to Cupar to avoid competing with it. It also explains that complementary opportunities are identified for additional small and medium scale development in Auchtermuchty, Falkland, and Newburgh. The strategic development area is supported in TAYplan, and a planning application in principle has been submitted for the vast majority of the area allocated for strategic development (CUP 001).

2. Several of the representations seek changes to the strategy in an attempt to promote alternative housing sites for development outwith the preferred locations identified in the proposed plan. They are concerned that the strategy over relies on the delivery of housing in the Cupar North Strategic Development Area, and inappropriately restricts development opportunities elsewhere. The overall sufficiency of the housing land supply is considered in detail at Issue 2(b), where it is concluded that adequate housing land has been provided in the TAYplan area in line with requirements set out in the strategic development plan, and that there is a 5 year effective housing land supply in both the Cupar and North West Fife and St Andrews and North East Fife Housing Market Areas, based on the 2015 Housing Land Audit. The Cupar North Strategic Development Area is considered in detail at Issue 17, where it is concluded that it should be retained in the proposed plan, subject to changes, including to the detailed development requirements set out for the allocation. The alternative housing sites promoted which, if allocated, may have potentially required a change to the strategy, have not been recommended for inclusion in the proposed plan. In light of these factors, I consider that it would be inappropriate to amend the strategy for Cupar and Howe of Fife to facilitate the creation of further housing opportunities in Cupar and the wider area.

3. Turning to the other representations, the scale of the housing proposed in the strategic development area has been established in TAYplan, and carried through to the proposed plan. Provision is also made for a mix of uses within the strategic development area, including the provision of employment land. Bearing in mind the conclusions at Issue 17, I consider that there is little scope for reducing the scale of the strategic development area or questioning the principle of it. The provision and delivery of the relief road is also considered at Issue 17, along with that of other key infrastructure. I am not persuaded that there is any justification for deleting or amending the very general terms of the references to these matters in the strategy, which are not at odds with the development requirements set out for this strategic allocation in the proposed plan, or the conclusions drawn and recommendations made at issue 17. I see no good reason for requiring the strategic development area to be set within a settlement development framework. An important consideration in assessing the strategic proposals as they come forward through the masterplanning process, would be the impact that they have on the social and built fabric of the town. In the circumstances, I do not consider that any amendment to the strategy for Cupar and Howe of Fife is necessary or warranted.

4. Overall, no adjustment is required to the proposed plan.
5. The East Neuk Area Strategy in the proposed plan is to continue the strategy from the previous local plan. It highlights the East Neuk Community Action Plan, explaining that it is a means through which the rural economy and the housing needs of East Neuk communities can be accommodated and is likely to develop as a community major stakeholder in development plan preparation.

6. One representation seeks to change the strategy in an attempt to promote an alternative site for a potentially significant housing development at Crail Airfield, on the basis that there is a housing land shortfall and because of particular concern about the viability of the St Andrews West Strategic Development Area. The overall sufficiency of the housing land supply is considered in detail at Issue 2(b), where it is concluded that adequate housing land has been provided in the TAYplan area in line with requirements set out in the strategic development plan, and that there is a 5 year effective housing land supply in both the St Andrews and North East Fife and Cupar and North West Fife Housing Market Areas, based on the 2015 Housing Land Audit. The St Andrews West Strategic Development Area is considered in detail at Issue 16, where it is concluded that it should be supported, subject to a change to the detailed development requirements set out for the allocation. Crail Airfield is included in the proposed plan as an allocation for an “other proposal”, and the plan identifies a number of potentially suitable uses, including limited housing development. It is considered in detail at Issue 15b, where it is concluded that a proposal to remove the restriction on the amount of housing should not be endorsed. In light of these factors, I consider that it would be inappropriate to amend the strategy for the East Neuk area to facilitate the creation of a further significant housing opportunity at this location.

7. In relation to the other representations, I am not persuaded that it is necessary to refer in the general strategic overview for the East Neuk area to examining the potential of Largoward to accommodate appropriate growth. I consider that this more detailed matter is sufficiently dealt with already in the Largoward Settlement Plan section of the proposed plan, where it indicates, amongst other things, that there is scope for development, and that a masterplan will be prepared in consultation with the community, through the East Neuk Community Action Plan. I do not agree that the East Neuk Community Action Plan would result in a few landowners devising the council’s planning strategy for the area. The general strategic overview set out in the plan is clear that this initiative will work with elected members, public agencies and community organisations, and that future iterations of the local development plan would take account of the land use proposals coming forward. I am satisfied that the preparation of the plan would remain firmly in the control of the council. While the East Neuk area has charm and character, there is no basis for promoting it as a national park through the local development plan process. In the circumstances, I do not consider that these matters warrant any changes being made to the strategy for the East Neuk area.

8. Overall, no adjustment is required to the proposed plan.

St Andrews Area Strategy

9. The St Andrews Area Strategy in the proposed plan highlights the continuation of the St Andrews West Strategic Development Area from the adopted local plan, the lack of significant change to the established strategy for the area, and the need to continue to protect the town’s historic centre. It also refers to the importance of the green belt
10. Several of the representations seek changes to the strategy in an attempt to promote alternative housing sites for development outwith the preferred locations identified in the proposed plan. They are concerned that the strategy over relies on the delivery of housing in the St Andrews West Strategic Development Area, and inappropriately restricts development opportunities elsewhere. The overall sufficiency of the housing land supply is considered in detail at Issue 2(b), where it is concluded that adequate housing land has been provided in the TAYplan area in line with requirements set out in the strategic development plan, and that there is a 5 year effective housing land supply in both the St Andrews and North East Fife and Cupar and North West Fife Housing Market Areas, based on the 2015 Housing Land Audit. The St Andrews West Strategic Development Area is considered in detail at Issue 16, where it is concluded that it should be supported, subject to a change to the detailed development requirements set out for the allocation. The alternative housing sites promoted which, if allocated, may have potentially required a change to the strategy, have not been recommended for inclusion in the proposed plan. In light of these factors, I consider that it would be inappropriate to amend the strategy for the St Andrews area to facilitate the creation of further housing opportunities either in St Andrews or beyond.

11. Furthermore, I consider it unnecessary to add a further sentence to the strategy indicating that the longer term housing pressures generated by the continued development of St Andrews University will require specific attention in future iterations of the local development plan. This matter will inevitably be taken into account in future reviews of the plan if it is appropriate. I am not persuaded that there is much to be gained by including references in a general strategic overview for the St Andrews Area to the conclusions of the 2013 reports by the St Andrews Town Commission on Housing (Housing Needs and Housing Pressures in St Andrews) and the St Andrews Centre for Housing Research (Growing Economy & Building Homes – Reconciling Growth & Housing Wellbeing in St Andrews). The council has confirmed that the latter report has been taken into account in putting forward the proposals for St Andrews in the plan. Concerns about the potential for “development creep” from further housing development and the intensification of existing permissions are best dealt with on a site specific basis. They are not matters which require a change to the strategic overview of the area.

12. Turning to other matters raised in representations, while concerns are expressed about damage to the area’s historic environment, I find the broad reference in the strategy to protecting the historic centre of St Andrews reasonable because it provides an appropriate context for the various cultural designations and associated policies set out in the proposed plan, which affect this area. Based on the evidence presented to the examination, it would appear that a possible rail link to St Andrews has not yet reached a stage where it could realistically be considered for inclusion in the strategic overview. The impact on health of additional road traffic emissions arising from development proposals is best addressed through the development management process when more information about a development is available. The implications of the allocations proposed in the plan for infrastructure and services in St Andrews, the future of Station Park, and the potential use of North Haugh for educational purposes are all dealt with in Issue 16. I am satisfied that none of these matters warrant changes being made to the strategy for the St Andrews area.

13. Concerns are also expressed about the reference in the strategy to the proposed secondary school on Pipeland Farm and the proposals for the existing Madras College around St Andrews, and the proposals for a new secondary school at Pipeland Farm.
campuses. These matters are considered in detail at issue 16, where it is recommended that the proposals be deleted from the proposed plan, and the text for the strategy of the area changed to reflect the recommendation.

14. Overall, with the exception of the changes recommended at Issue 16, no other adjustment is required to the proposed plan.

15. See also Issue 16.

Tay Bridgehead Area Strategy

16. The Tay Bridgehead Area Strategy in the proposed plan highlights that Newport, Wormit, Tayport, Leuchars, and Guardbridge continue to be the best options for locating development, that the area has around 600 allocated houses through previous local plans, and that further large scale allocations are not required during the plan period.

17. The representations seek changes to the strategy in an attempt to promote alternative housing sites for development outwith the preferred locations identified in the proposed plan. They are concerned that the strategy over relies on the delivery of housing on sites allocated in the proposed plan, and inappropriately restricts development opportunities on other sites, including at Wormit and Tayport. The overall sufficiency of the housing land supply is considered in detail at Issue 2(b), where it is concluded that adequate housing land has been provided in the TAYplan area in line with requirements set out in the strategic development plan, and that there is a 5 year effective housing land supply in both the Cupar and North West Fife and St Andrews and North East Fife Housing Market Areas, based on the 2015 Housing Land Audit. The housing allocations in the proposed plan, and the alternative housing sites put forward, in the Tay Bridgehead area are considered in detail at Issue 20, where it is concluded that the allocations in the plan should be retained, subject to some changes. The alternative housing sites promoted, which may have potentially required a change to the strategy, have not been recommended for inclusion in the proposed plan. In light of these factors, I consider that it would be inappropriate to amend the strategy for the Tay Bridgehead area to facilitate the creation of further housing opportunities.

18. Overall, no adjustment is required to the proposed plan.

Reporter's recommendations:

No modifications. (See Issue 16).
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Ian McCall (1799)
Iain Tait (1804)
Persimmon Homes East Scotland (1843)
Springfield Properties Plc (2017)
Fay Fairley (2113)
Katrina McColl (2215)
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Rogers (2228)
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Persimmon Homes (East Scotland) (1972)
The Woodland Trust Scotland (2880)
DGB004 St David’s Harbour – Harbour Place
Gillian Tivey (658)
DGB007 Hillend/Donibrislte Industrial Estates, Western Edge
Scarborough Muir Group (607)

INVERKEITHING
Robert Kerr (28)
Dalgety Bay & Hillend Community Council (78)
Ruth Lockier (91)
Karen Paterson (94)
Nichola Smith (929)
Roy Green (1225)
Kathryn Green (1586)
Olivier Camy (1632)
Crispin Hill (1702)
Iain Tait (1808)
Ian McCall (1815)
Simon Cochrane-Mills (1816)
Taylor Wimpey/ASPFL (1917)
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ROS013 Rosyth International Container Terminal
Scottish Enterprise (1893)
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ROS014 Rosyth Rail Halt Park and Choose
(SEPA) (3592)
ROS 015 Land at Admiralty Road and East of Brankholm
SEPA (3594)
ROS016 Castlelandhill (North)
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Ralph Payne (311)
Naomi Payne (356)
David Dykes (370)
Cathie Dykes (371)
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<td>Lesley McGrath (Holder Planning) for (Forth Ports Ltd) (1712)</td>
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### Settlement Plans: Charlestown, Culross, Dalgety Bay, Inverkeithing, Kincardine, New Row & Tulliallan, Rosyth, Torryburn, Countryside Proposal LWD 011

#### Planning authority's summary of the representation(s):

**CHARLESTOWN**

**CHL 001 Land at Scottish Lime Centre**

The Broomhall Estate (1480): Object to the boundary of employment Proposal CHL001 extending along buildings and curtilages on the east side of Rock Road. These areas are in other uses and the Broomhall Estate does not intend to change their uses to employment. The boundary of CHL 001 should just cover the curtilage of the Lime Centre. The strip of land in front of the old school should be included within proposal CHL 002 for residential use.

**CHL 002 Land at the Old School**

The Broomhall Estate (1483): Support the allocation of the old school site for residential development, support that capacity of 5 units but note that the design process will determine the appropriate number of units. The area immediately to the west of the site is designated for employment use, this designation should be removed from this area and the land in from of the old school building should be included within the boundary of proposal CHL 002.

Scottish Environment Protection Agency (3323): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site and the inclusion of a Site Requirement for high quality SUDS.

**CHL 003 Land at Charlestown Harbour (Ballast Bank)**

The Broomhall Estate (1486): Support the allocation of land at Ballast Bank as a site...
with regeneration potential. In 2012 the reporter who considered the site recommended that there should be text incorporating a presumption in favour of an appropriate enabling development to bring the site back into beneficial use. In order to achieve this the following uses should be identified as preferred uses on the site:

- Residential (houses and/or flats - 40 units)
- Class 3 (restaurant, cafe, snack bar)
- Class 7 (hotels)

Scottish Environment Protection Agency (3324): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site and the inclusion of a Site Requirement for high quality SUDS

CHL 004 Camsie House

Woodland Trust (2871) object to these sites being identified for further development since this will lead to the loss of ancient woodland and damage to ancient woodland. Consider that these site allocations should not be taken forward unless the protection of the adjacent woodland can be guaranteed.

CULROSS

Culross Issues

Culross Community Council (51) Support for the proposed FIFEplan Local Development Plan settlement boundary at land east of Kirk Street. This is considered to protect visual and environmental amenity.

Mark Richardson (1748) Objects to the proposed FIFEplan Local Development Plan settlement boundary at land east of Kirk Street. No justification has been provided for this and the change is considered to be contrary to Scottish Government Plan review procedures and heritage planning policy and practice.

Robert Neilson (808) object to the non-inclusion of a housing land release of approximately 50 dwellings at Fife Local Development Plan Development Strategy Consultation Candidate Site CUL001 (CD13). Consider this to be a logical expansion of the settlement and a deliverable allocation whilst maintaining the conservation and environmental interests of the settlement of Culross.

DALGETY BAY

Dalgety Bay Issues

Dalgety Bay & Hillend Community Council (79), Joaquin Blasco (1397), Stuart & Sandra Milne (1462), David Wilson (1537), Ian McCall (1799), Iain Tait (1804), Andrew Gardner (2225), Katrina McColl (2215): Support Fife Council Executive Committee decision on 9th September 2014 to remove FIFEplan Development Strategy Consultation (CD13) Candidate Site DGB001 from the proposed plan.

Roy Green (103): FIFEplan Development Strategy Consultation (CD13) candidate site LDP-DGB 002 is suitable for housing development as it is in a sustainable location, close to major facilities, within the settlement boundary and would make use of the over
provision of employment land in Dalgety Bay.

John & Margaret Cameron (276): Would object to any development on the fields around FIFEplan Development Strategy Consultation (CD13) Candidate Site LDP- DGB001 as this is a recreational green belt area. The land was an agricultural buffer provided between Dalgety Bay and the Braefoot Bay Terminal.

David & Anne Chadwick (1517), John McColl (853), Kathryn Green (82), Roy Green (103), Sarah Golden (848), Linda Wilson (927), Ian Smith (850), Janice Olley (1455), Olivier Camy (1630), Fay & Sam Fairley (2113), Mrs Rogers (2228), Mike & Irene Perreur-Lloyd (2276): Support Executive Committee decision on 9th September 2014 to remove FIFEplan Development Strategy Consultation (Core Document 13) Candidate Site LDP- DGB001 from the proposed plan, and raise some of the following issues supporting this decision: landscape, habitat and recreational value of the site; agricultural diversity; pressure on local infrastructure; adverse impact on listed buildings; proposal is contrary to Scottish Planning Policy concept of sustainable development; and there are alternative sites suitable for housing within the town boundary, in particular the industrial estate and brownfield sites.

J A C Thompson (516): Supports Executive Committee decision on 9th September 2014 to remove FIFEplan Development Strategy Consultation (CD13) Candidate Site LDP- DGB001 from the proposed plan, but is concerned that planning applications can still be made for development on the site under the policies in the plan, this would be contrary to FIFEplan 2014.

Persimmon Homes (East Scotland) (1843): Object to the Council’s Executive Committee decision to delete FIFEplan Development Strategy Consultation (CD13) Candidate Site LDP-DGB001 from the proposed plan which was a late and un-consulted amendment. No material planning reasons were given for the decision which went against support for the site from planning officers. The site was also previously considered suitable for housing purposes by Scottish Government Reporter in 2010 and 2011.

The site should be reinstated into the plan as a housing proposal with a capacity of 150 units. This would maintain a stable and consistent framework within which investment decisions can be made with confidence allowing for the short term delivery of an effective and viable site and can therefore be supported by Policy 7 of SESplan which permits the allocation of greenfield housing sites outwith the identified strategic development areas. Benefits of the site include links and proximity to the existing settlement allowing it to grow sustainably supporting and sustaining existing services and local facilities. The site is not within a green belt or a Local Landscape Area.

Springfield Properties Plc (2017): Object to the established employment land designation on candidate site LDP-DGB002 (24 Ridge Way), the site should be designated as a development opportunity site for housing/business/employment uses.

The proposed LDP does not address the housing requirements of SESplan and its Supplementary Guidance and therefore is not consistent with Scottish Planning Policy. A large number of additional effective housing sites need to be allocated to address the critical shortfall in housing land supply. Dalgety Bay is well located near the Forth bridgehead and has proved effective in delivering new housing; it has good accessibility and strong connections to employment opportunities in Fife and Edinburgh. Currently only one site is allocated for housing in Dalgety Bay (proposal DGB 004) with a capacity
Candidate site LDP-DGB002 is a brownfield site within the settlement boundary, accessible by a choice of transport options. The site meets the tests of effectiveness: Springfield Properties Plc controls the site, there are no physical constraints on development, there is no known contamination on the site, no public funding is required, Dalgety Bay is a popular housing market location, required infrastructure is available or can be made available, some business/commercial uses will be provided on the site alongside residential development, an indicative layout is supplied. The site can be delivered in the short term (within 3 years).

The employment designation should be removed from the site. There is no market demand for the existing premises and redeveloping the entirety of the site for Class 4, 5 or 6 uses is simply not a viable commercial proposition evidence has been submitted to support this position. Considering previous take up rate of employment land there is over a 53 year supply of employment land in Fife. The proposed LDP identifies four employment sites are identified in Dalgety Bay and there is already 10-12 years supply of available employment land existing in Dalgety Bay. The removal of the existing employment allocation affecting the land at Ridge Way is justified and, crucially, will have no detrimental impact upon existing supply levels of business land and available property which remain well in excess of likely demand/take-up.

DGB 001 OCLI, Donibristle Industrial Estate

Persimmon Homes (East Scotland) (1972): It is unclear if the capacity (125) shown for proposal DGB 001 is the remaining capacity or the total for the site. Need this clarity to determine the impact on the LDP Housing Supply.

The Woodland Trust Scotland (2880): Proposal DGB 001 is adjacent to an area of ancient woodland (acknowledge has been granted Planning Permission in Principle). However, object to development on this site as it would lead to loss or damage to ancient woodland and recommend that the site is not allocated unless the protection of the adjacent woodland can be guaranteed. If the site is to be identified for development a 10m buffer between the proposed development and woodland should be identified as a development requirement. Recommend that appropriate survey work is carried out if protected species are present on site or adjacent to the site.

DGB 004 St David’s Harbour – Harbour Place

Gillian Tivey (658): Object to the allocation of proposal DGB 004, the housing would detract from the surroundings. The viability of the public house/restaurant is questioned and could lead to noise pollution and anti-social problems in the area.

DGB 007 Hillend/Donibristle Industrial Estates, Western Edge

Scarborough Muir Group (607): Object to the allocation of this site for employment uses only, this designation fails to recognise the existing mixed uses on the site, and the potential for further mixed use redevelopment of this important gateway location and does not acknowledge the planning permission granted for this site in November 2014. The allocation in the LDP should acknowledge the granting of planning permission for the mixed use redevelopment (SD 1 Planning Application Decision Notice Ref: 13/02953/PPP) with scope for class 1, 3, 4, and 11 uses.
INVERKEITHING

Inverkeithing issues

Robert Kerr (28), Dalgety Bay & Hillend Community Council (78), Ruth Lockier (91), Karen Paterson (94), Nichola Smith (929), Roy Green (1225), Kathryn Green (1586), Olivier Camy (1632), Crispin Hill (1702), Ian McCall (1815), Iain Tait (1808), Catrina Cochrane-Mills (2259), Simon Cochrane Mills (1816) Inverkeithing Community Council (3791): Welcome the non-inclusion of residential development at Spencerfield (Main Issues Report candidate site INV002) a greenfield site to the east of the existing settlement boundary. Highlight objections to the inclusion of this site on grounds of protecting countryside amenity, access and preventing coalescence.

Taylor Wimpey (1917) formally objects to the non-allocation of land (Main Issues Report candidate site INV002) for a residential land allocation (circa 295 units) and associated open space/recreational use at Spencerfield, Inverkeithing contending that the allocation of land at Spencerfield, Inverkeithing is wholly in accordance with SPP, SESplan and its spatial strategy. Confirms that the site is sustainably located and deliverable housing land allocation which can be master planned in a landscape led manner to addresses the one outstanding issue found against in the previous planning appeals (SD2 DPEA reference PPA-250-2176 - Planning Permission Appeal).

INV 001 (Borelands Reservoir), INV 006 (Belleknowes Industrial Estate 1), INV 007 (Belleknowes Industrial Estate 2), INV 008 (Belleknowes Industrial Estate 3), INV 009 (Former Caldwell Mill)

SEPA (3473, 3474, 3475, 3476, 3477): Support the inclusion of requirement for a flood risk assessment, inclusion of a buffer strip and requirement to consider through a feasibility study the potential for restoration and improvement of the water environment.

INV 004 Former Inverkeithing Primary School, Roods Road

Roy Green (1720): Expresses support noting that the subject site (INV004) is within the existing boundary of Inverkeithing.

INV 009 Former Caldwell Mill

Scottish Enterprise (1057): Supports the allocation of the subject site (INV009) and the adjacent site as safeguarded employment uses.

Donna DuCarme (980): Welcomes the environmental considerations and support improvements to coastal path connections.

Taylor Wimpey (1744): Supports the identification of land at Caldwell Mill for employment purposes and the identification of RM Supplies as existing employment land. Contends that the proposed FIFEplan acknowledges that the current local plan designation of circa 600 residential units between Caldwell Mill and RM Supplies, as part of a strategic development area has no strategic planning context or delivery prospect.

FRM Recycling (1992, 1993, 1994, 1999): Inverkeithing Community Council (958) Seeks to maximise the potential of the site to contribute to the business, tourism and residential investment opportunities. Considers that allocation of this site for Class 5 and 6 uses will
not maximise support for the town centre and will seriously impact upon amenity due to increased traffic. Contends that Class 4 business use would provide a good range of jobs for local people and could be easily accessed by rail services from other parts of central Scotland.

INV 012 Fraser Avenue

SEPA (3254): Note that this site is located in or adjacent to the functional flood plain or an area of known flood risk. As such, part of the site may not be suitable for development and a Flood Risk Assessment (FRA) should be included as a site specific developer requirement.

KINCARDINE, NEW ROW & TULLIALLAN

Kincardine, New Row and Tulliallan Issues

Comstock/McLaren/Fairly (3689): Objects to the Adopted Dunfermline & West Fife Local Plan Site KCD002, KCD003 and KCD008 (CD8) being removed from the Proposed Plan due to an objection made by Scottish Environment Protection Agency (SEPA) in respect of flooding and their amended flood risk map. Notes that although this area lies outwith the two new Strategic Development Areas introduced by SESplan, it is appropriate that further allocations are made in this area due to its proximity to jobs, services, and other infrastructure. Confirms that the site has an indicative capacity of 490 units with a Flood Risk Assessment submitted to address SEPA objection on 5 September 2014. This demonstrated that the parameters met the 200 year flood requirements and has been accepted by SEPA.

NHS Fife (3849): Highlights potential impact on local healthcare facilities from the 130 houses under construction and the potential additional 66 houses in this area.

KCD 004 Kincardine Multi Storey Flats

Woodland Trust (2899) objects to these sites being identified for further development since this will lead to the loss of ancient woodland and damage to ancient woodland.

KCD 006 Kincardine Power Station 4 East

Andy Willo (984) highlights the impact on the amenity of the waterfront along the River Forth which has valuable recreational space, important historic and environmental amenity in addition to the potential for improved public access to the north east of the site including cycle routes connecting central Scotland. Seeks presumption in favour of housing uses and low carbon technologies.

Scottish Power (1773) objects to the open space designation citing the presence of alternative provision elsewhere within the settlement and highlights that due to ongoing operational and radar activities large part of the site are unsuitable for development.

RSPB Scotland (2828) objects to the wording of the settlement plan seeking greater emphasis on the precautionary approach with regard to Firth of Forth SPA.

SEPA (3478) Support the inclusion within developer requirements for a flood risk assessment to be completed.
**KCD 011 North Approach Road**

Andy Willo (985) objects to retail or commercial provision outwith the town’s existing retail area.

**KCD 015 Kirk Brae**

Andy Willo (986) objects to the boundary of the proposed extension of the conservation area as the area to the south of Kirk Brae has not been included.

**ROSYTH**

**Rosyth issues**

Scarborough Muir Group (1025): The allocations set out in the Proposed LDP fail to recognise the site's long established background as an area of mixed uses which are sought as Proposed Plan allocations including residential. This background, and history of the site, is not being recognised in the Proposed LDP nor is the significant planning history and status as a major brownfield redevelopment site.

The Proposals Map colours the area defined as "Proposal ROS012" as an employment area which contradicts the Leisure/Community Other Proposal description given in the Table on page 155 of the Proposed LDP (CD5). In addition parts of the wider site including the western and eastern extremities of the site are shown as "white land" on the Proposals Map, with no accompanying Proposals listed, and would be subject to Policy 1. Other parts of the site are shown as existing "safeguarded employment areas" with no accompanying Proposals listed.

Forth Ports Ltd (1706): Supports the designation of the Port of Rosyth as a safeguarded employment area and this reflects its industrialised nature. A broad range of operational port functions take place at the Port. Increasingly it has a key role in supporting the energy industry including the renewables and North Sea oil and gas. It supports an international commercial ferry route between Scotland and continental Europe and is used as a cruise liner terminal.

It is noted that within the broader Waterfront area there are a number of roads which are not included within the safeguarded employment area. The Council may wish to include these roads within the employment area for completeness.

Scottish Enterprise (1906): Welcomes the continued identification of entire Rosyth Port and the immediate hinterland area as an important location for strategic employment development particularly related to the energy sector which supports the recognition of the Port as a nationally significant development in NPF3 (paragraph 6.7, page 66). SE fully supports the PLDP allocations of all land within the entire Rosyth Port and the immediate hinterland area as safeguarded and proposed strategic employment sites and would object to any proposal to amend the PLDP. SE supports the approach taken by Fife Council to seek the preparation of a Development Framework for this area. SE welcomes the opportunity of participating in this process

NHS Fife (3856): Note that potential additional 850 houses in this area could have impact on local healthcare services.
Non-Inclusion of Site adjacent to Hillwood Terrace, Rosyth

Broomhall Estate (1491): The site was subject of an officer assessment (candidate site reference LDP-R0S007) as part of the FIFEplan Development Options exercise in December 2013 and the site was not supported for allocation as a housing site at that time. This is a small site which would appeal to local housebuilders and could be served with minimal impact on infrastructure.

Non-Inclusion of Site at Hilton, Rosyth

Alfred Stewart Property Foundation (1766, 1774) oppose the non-allocation of land for employment uses at Hilton Rosyth. The site is included in the Main Issues Report Site Atlas and Proposed Plan Site Assessments with reference LDP-ROS002 (b). Hilton represents an excellent opportunity to deliver a high quality Class 4 employment development that will meet local, Council wide and national employment needs. The site is well located in terms of the local and national roads network and immediately adjacent to the Rosyth Naval Dockyard.

Non-Inclusion of site at Rosyth Park, Rosyth

Alfred Stewart Property Foundation (1777): The site covers is a logical extension of the land that the Council wishes to construct a park and choose facility on at Rosyth. The proposed development site would use the same access as the proposed park and choose and agreement has been reached with Council transportation officials on a reconfigured access arrangement to achieve that. Rosyth Park is a deliverable and sustainable small scale location for development supported by national and strategic planning policy.

ROS 002 Brankholme Lane

Martin Rogers (1842): Notes miss-spelling – Brankholm.

ROS 003 Cochranes Hotel

What’s Happening Rosyth (1640) – petition citing 59 names. Comments in favour of making Rosyth waterfront a mixed use area not for port related use only. Seek an area where the people of Rosyth can visit and enjoy in addition to one that could benefit from leisure and tourism which accounts for 3% of Scotland’s economic output. Reference Dundee, Glasgow City Centre waterfront including Hydro and V&A in addition to Helix Park near Falkirk.

ROS 004 Primrose Lane 2

Martin Rogers (1914): Seeks land retained for employment uses and continuation of the existing informal public open space.

SEPA (3587): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA), buffer strip and feasibility report to help restore and protect the water environment.
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<td><strong>ROS 005 (Rosyth Europarc 3); ROS 006 (Rosyth Waterfront 1); ROS 007 (Rosyth Europarc 1); ROS 008 (Rosyth Europarc 2); ROS 009 (Rosyth Waterfront 2); ROS 010 (Rosyth Waterfront 3) &amp; ROS 012 (Rosyth Waterfront 4)</strong></td>
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Scarborough Muir Group (1035, 1034, 1037, 1031, 1029, 1026, 1025): Object to the proposed allocation of this site for employment use only. Consider the various policy designations ROS005; ROS006; ROS007; ROS008; ROS009; ROS010 & ROS012 as set out on pages 153 to 155 of the Proposed LDP (CD5) and the accompanying Proposals Map confusing, lacking clarity, co-ordination and consistency. Contends that restricting the redevelopment of the site for employment uses only does not reflect the site's long established background as an area of mixed uses.

**ROS 005 Rosyth Europarc3, ROS006, ROS007 Rosyth Europarc 1, ROS008, ROS009, ROS010 Rosyth Waterfront 3, ROS011 Admiralty Park, ROS13**

Scottish Enterprise (1873, 1876, 1878, 1883, 1887, 1890, 1899, 1893): Welcomes the continued identification of entire Rosyth Port and the immediate hinterland area as an important location for strategic employment consistent with NPF3 (CD31). SE fully supports the allocations of all land within the entire Rosyth Port and the immediate hinterland area as safeguarded and proposed strategic employment sites and supports the approach taken by Fife Council to seek the preparation of a Development Framework for this area. Considers that loss of key employment land to mixed use (offices, industry, retail, residential, restaurants, leisure and recreation) at this location would seriously jeopardise the Scottish Government and key agencies attempts to secure the economic development of the Port for energy-related industries. Whether the consultation process relating to alternative uses generates public support or not, SE considers this would achieve short term local gain at the cost of long term sustainable national economic benefit. Rosyth is an important deep water port of the east coast of Scotland, as recognised in NPF3 (CD31), and SE considers that it would be prudent to retain this land as employment land.

SEPA (3588): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA),

**ROS 006 Rosyth Waterfront 1**

Martin Rogers (1918): Opposed to housing in this area and support the decision not to designate any part of the area for this purpose

**ROS 008 Rosyth Europarc2**

SEPA (3589): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA).

**ROS 009 Rosyth Waterfront 2**

RSPB Scotland (2827): State concerns over whether it will be possible to accommodate development in this area without causing ongoing disturbance to birds associated with the Firth of Forth SPA.

SEPA (3590): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA).
### ROS 012 Rosyth Waterfront 4

Scottish Enterprise (1901): Whilst in principle SE supports the designation of ROS012 for uses unrelated to the port and energy-related industry, it considers that the allocation should be for Tourism/leisure/community to provide clarity as to the intended uses and purposes of this area of land. SE supports economic development related to the tourism industry at only this 6.4 ha site at Rosyth due to its relationship with the Forth Bridge crossings.

SEPA (3590, 3591): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA).

### ROS 013 Rosyth International Container Terminal

SEPA (3275): Seek that a Flood Risk Assessment (FRA) be included as a site specific developer requirement.

### ROS 014 Rosyth Rail Halt Park and Choose

SEPA (3587, 3592): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA), buffer strip and feasibility report to help restore and protect the water environment.

### ROS 015 Land at Admiralty Road and East of Brankholm

SEPA (3594): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA), buffer strip and feasibility report to help restore and protect the water environment.

### ROS 016 Castlelandhill (North)

John Winton (73), David Dykes (370) Georgina Tallis (213), Cathie Dykes (371), Ralph Payne (211), Naomi Payne (356), Judith Payne (513), Steven Murray (1048), Alex Mackie (1337): Object to Proposal ROS016 and raise some or all of the following issues:

- This is a green belt/greenfield site used for farming.
- There are already drainage issue in the area.
- Capacity issues of the road infrastructure, schools and health facilities.
- New development is likely to create overlooking and daylighting detriment to existing property.
- Brownfield sites should be chosen in preference to agricultural land.
- Growth should be focused to the north of Dunfermline

Stephen & Catriona Bennett (883), Colonel and Mrs C P C Sloan (568), S McHatton (891), David Fisken (1011), Kevin Borthwick (1017), Mark Graham (1022), G Forbes (1028), Norma Brown (1036), Susan Potter (1041), Wendy Laing (1071), G Watt (2392): Adds capacity to an already overburdened road (Castlandhill Road) thereby increasing the risk of accidents at the Lothians View/Castlandhill Road Junction and further antisocial behaviour on Lothians View (including illegal fly tipping). Highlights flooding objections with development increasing surface run off and detracting from landscape or historic environment qualities. The latter includes compromising an important part of a
nationally important battlefield.

Cllr D Chapman (975), Rosyth Community Council (1754): Reference a petition (SD3) which was submitted by Rosyth Community Council on 2nd December 2014. The petition represents objections to the site and seeks removal. Key concerns are access difficulties, problems with drainage and flooding in the existing development to the north of the proposed site and residents desire to keep this area as open, agricultural land. It also notes significant issues with the gradient of the site.

June Barenbrug (1217): Questions why the proposed development ROS16 is thought to comply with Paragraph 80 of Scottish Planning Policy (CD1) and noted concern about the landscape and visual impact of this proposed development.

Alfred Stewart Property Foundation (1844, 1848): Support the allocation for 150 residential units and associated development citing ongoing work with Fife Council departments to ensure delivery in conjunction with existing adjacent residential development. Consider the site wholly deliverable within the Local Development Plan period and effective per Planning Advice Note 2-2010 (CD10).

Martin Rogers (1923): Notes that gradients would be uncomfortably steep and an attractive view from many other parts of Rosyth would be spoiled by housing encroaching further up the slope Notes that there is no “e” in Castlandhill).

ROS 017 Castlelandhill (South)

Colonel and Mrs C P C Sloan (661), Stephen & Catriona Bennett (881), S McHatton (889), Steven Murray (896), David Fisken (899), Kevein Borthwick (1015), Mark Graham (1021), G Forbes (1027), Norma Brown (1032), Susan Potter (1040), Wendy Laing (1072), G Watt (2394): Adds capacity to an already overburdened road (Castlandhill Road) thereby increasing the risk of accidents at the Lothians View/Castlandhill Road Junction and further antisocial behaviour on Lothians View (including illegal fly tipping). Highlights flooding objections with development increasing surface run off and detracting from landscape or historic environment qualities. The latter includes compromising an important part of a nationally important battlefield. Notes that adopted Dunfermline and West Fife Local Plan identifies a radius of approx. 2000m centered on the Rosyth Dockyard as a Major Hazard Site. If this is to have any relevance, it would seem sensible therefore to prohibit any new dense settlement within this radius. The proposed hotel development is within this area.

Alfred Stewart Property Foundation (1802): The hotel and conference facilities are wholly supported. The site is deliverable within the short to medium term in conjunction with completion of the Replacement Forth Crossing due to open in 2016 and that this allocation represents a unique opportunity to provide a truly iconic development in a key gateway site. Consider site benefits from excellent access and transport links and offers a unique site for such a development which can utilise its setting and impressive vista across the Forth.

Martin Rogers (1928): Objects to this site referencing the narrow shape and size of the site in addition to preference that this is retained as a rural, countryside landscape.
ROS 019 Rosyth Bypass

Martin Rogers (1930): Queries the delivery of the proposed Rosyth bypass noting that the proposed plan shows this as being private sector led.

ROS 020 Rosyth Renewable Energy Plant

Forth Ports (1712): Support the identification of the Rosyth Renewable Energy Plant. This is appropriate and reflects the extant consent.

TORRYBURN

Torryburn Issues

BP North Sea Infrastructure (1256): Include reference to the presence of the pipeline within the next version of the plan, to ensure that future education uses on site take account of the consultation zone/s

TOR 001 Craigflower Woodland

Torryburn and Newmills Community Council (2794): Supports the proposal that a woodland management plan will be developed.

COUNTRYSIDE AREA

Cruiks, Quarry, Inverkeithing

Lafarge Tarmac (3718) objects to the allocation of Cruicks Quarry, Inverkeithing, as a Green Infrastructure Opportunity Site on the basis that the plan period is likely to be shorter than the period of the existing consented quarrying works, and consider that the site of Cruicks Quarry should be identified as a consented quarry site instead. This also applies to potential after-quarrying proposals being worked up by the owners around a potential marina and associated mixed uses. In addition, and connected with the operation of the quarry, Fairhurst considers that the continued use of the wharf should be protected through the emerging Local Development Plan, as the wharf on site is of strategic economic importance to Lafarge Tarmac.

Crombie Issues

John Wilson (1293): Candidate site LDP- CRM001 - plans for a mixed use development will bring local services, jobs and visitors to Crombie, and help to protect local facilities such as the school. Indicates that the site is free of constraints and has the backing of developers with track records in delivering commercial and residential developments. Indicates that scale of housing development has been reduced and a signature building has been introduced into the proposal in response to concerns over visual impact, which will give the village a profile and act as a symbol of regeneration.

West Fife Villages Community Council Forum (2811), West Fife Villages Community Projects Group (2820): Object to the non-inclusion of sites for housing land at Crombie (Candidate site LDP- CRM001) which was recommended by the South West Area Committee in August 2014.
Scottish Power Generation Ltd (1776): Encouraged that Longannet Power Station’s status as a National Development within NPF3 is recognised within Schedules LWD 011 and LWD 012, however Scottish Power would have expected this significant and important designation to be more explicitly identified within FIFEplan’s Proposals Map. It is also pleasing to note that FIFEplan recognises Longannet Life Extension Project and revisions to the Ash Disposal Strategy. Longannet Power Station comprises of a number of component parts within overall site, including coal handling plant, the generation station itself along with ancillary infrastructure, such as jetties, cooling water intake and outfall, etc. and local Longannet Lagoons.

Provides map showing extent of site and operational requirements of site (SD4)

Concerns about FIFEplan Green Network Opportunities proposed at Longannet Lagoons. Longannet site is not one where general public have access and therefore to propose Green Network Opportunities would not be suitable. Scottish Power recommends that the entire Longannet site be safeguarded for employment purposes related to energy and related uses, which would include Scotash’s existing operations at the Longannet lagoons where ash generated from the combustion process is recycled and used within the construction industry.

Scottish Power requests that as part of the FIFEplan the site at Longannet is designated to support continued electricity generation at the site and that the designation is suitably flexible to allow for future technology and energy related developments at the site.

**Modifications sought by those submitting representations:**

**CHARLESTOWN**

**CHL 001 Land at Scottish Lime Centre**

The Broomhall Estate (1480): Amend the boundary to just cover the curtilage of the Lime Centre. Include the strip of land in front of the old school within proposal CHL 002 for residential use.

**CHL 002 Land at the Old School**

The Broomhall Estate (1483): Amend the boundary of Proposal CHL 002 to include the land to the west of the old school building. Remove this area of land from employment proposal CHL 001.

**CHL 003 Land at Charlestown Harbour (Ballast Bank)**

The Broomhall Estate (1486): Include the following as preferred uses on the site in the development requirements:

- Residential (houses and/or flats - 40 units)
- Class 3 (restaurant, cafe, snack bar)
- Class 7 (hotels)
Woodland Trust (2871) Request that where the allocations are taken forward, sufficient buffering between the proposed development and woodland should be identified.

CULROSS

Culross Issues

C Thorburn (1748): Include land east of Kirk Street within the settlement boundary enabling car parking provisions, enhanced public realm such as seating, new footpath linkages and modest infill development to meet local needs.

DALGETY BAY

Dalgety Bay Issues

Roy Green (103): Allocation of candidate site LDP-DGB002 for residential development.

Persimmon Homes (East Scotland) (1843): Deleted proposal DGB 003 (candidate site LDP-DGB001) should be reinstated in the plan as a housing site with a capacity of 150 units.

Springfield Properties Plc (2017): Remove the established employment land designation on candidate site LDP-DGB002 (24 Ridge Way), and identify the site as a development opportunity site for housing/business/employment uses.

DGB 001 OCLI, Donibristle Industrial Estate

Persimmon Homes (East Scotland) (1972): Require clarification if the 125 capacity indicated for proposal DGB 001 is the remaining capacity or a total for the site.

The Woodland Trust Scotland (2880): Delete proposal DGB 001 from the plan or identify a 10m buffer between the proposed development and the area of ancient woodland in the development requirements.

DGB 004 St David’s Harbour – Harbour Place

Gillian Tivey (658): Delete proposal DGB 004.

DGB 007 Hillend/Donibristle Industrial Estates, Western Edge

Scarborough Muir Group (607): Remove the employment allocation on proposal DGB 007, and identify the site as a development opportunity site for mixed use development with scope for class 1, 3, 4, and 11 uses. Include text acknowledging the planning permission (SD1 Planning Application Ref: 13/02953/PPP) in the development requirements.
INVERKEITHING

Inverkeithing Issues

Taylor Wimpey (1917): Allocation of land at Spencerfield, Inverkeithing as a residential (circa 295 units) and associated open space/recreational land use proposal.

INV 001 (Borelands Reservoir), INV 006 (Belleknowes Industrial Estate 1), INV 007 (Belleknowes Industrial Estate 2), INV 008 (Belleknowes Industrial Estate 3), INV 009 (Former Caldwell Mill)

SEPA (3473, 3474, 3475, 3476, 3477): Support developer requirements.

INV 004 Former Inverkeithing Primary School, Roods Road

Roy Green (1720): Retain proposed plan settlement boundary.

INV 009 Former Caldwell Mill

Taylor Wimpey (1744): Remove the current adopted Local Plan housing land allocations and identify Caldwell Mill and RM Supplies for employment purposes.

FRM Recycling (1992, 1993, 1994, 1999): Inverkeithing Community Council (958) The site should be allocated for a mixed use development supporting the town centre at Inverkeithing and consolidating the settlement core. Seeks that detailed proposals are subject to agreement of a master plan and in turn Supplementary Guidance.

INV 012 Fraser Avenue

SEPA (3254): Require a FRA which assesses the risk from potential culvert/s. PAN 69 outlines that development should not be constructed over an existing drain.

KINCARDINE, NEW ROW & TULLIALLAN

Kincardine, New Row and Tulliallan Issues

Comstock/McLaren/Fairley (3689): The Adopted Dunfermline & West Fife Local Plan Site KCD 002, KCD 003 and KCD 008 (CD8) should be reinstated in the Proposed Plan as an effective housing site.

KCD 004 Kincardine Multi Storey Flats

Woodland Trust (2899) recommends that if any protected woodland species are present on the development site or adjacent to the development site that the appropriate survey work is carried out.

KCD 006 Kincardine Power Station 4 East

Scottish Power (1773): Seeks the identification of the entire site for employment purposes including those related to energy and related uses. Highlights the safeguarded area/s within which development is restricted and/or prohibited, confirming that copies of this safeguarded area can be made available.
RSPB Scotland (2828) seeks wording within the settlement plans stating “an application for planning permission in principle, must demonstrate that the development would not adversely affect the integrity of the Firth of Forth SPA, either alone or in conjunction with other plans or projects.”

KCD 011 North Approach Road

Andy Willo (985): Seeks equal allocation and provision of housing and retail uses within the towns existing retail area.

KCD 015 Kirk Brae

Andy Willo (986): Include the area to the south of Kirk Brae within the proposed extension of the conservation area.

ROSYTH

Rosyth issues

Scarborough Muir Group (1025, 1037): Request that the entire 64 hectare site should be identified in the new Local Development Plan as a major mixed use redevelopment opportunity, capable of accommodating a range of uses reflecting its previous use; existing planning permissions; current development plan allocations; surrounding land uses and its highly accessible, strategic location.

This approach would reflect the long-standing commitment by Fife Council to promote a masterplan for the Rosyth Waterfront Area which would help to guide the range and location of future uses of this large, brownfield site. This would also provide the local community with a further opportunity to engage in the future planning of the area.

Forth Ports Ltd (1706) seek inclusion of roads serving and within the Port as protected employment areas.

Non Inclusion of Site adjacent to Hillwood Terrace, Rosyth

Broomhall Estate (1491): Request that this site is allocated for approximately 8 residential units in FIFEPlan.

Non-Inclusion of Site at Hilton, Rosyth

Alfred Stewart Property Foundation (1766, 1774): Request that this site is allocated for 13 hectares of employment land for business uses.

Non-Inclusion of site at Rosyth Park, Rosyth

Alfred Stewart Property Foundation (1777) seek allocation of land for Class 4 Business Use.

ROS 002 Brankholme Lane

Martin Rogers (1842): Amend spelling of Brankholme Lane to Brankholm Lane.
ROS 003 Cochrane's Hotel

What’s Happening Rosyth (1640): Seek amendment of designation to mixed uses.

ROS 004 Primrose Lane 2

Martin Rogers (1914): Seek allocation of site for employment uses.

ROS 005 Rosyth Europarc 3

Scarborough Muir Group (1026) Seek allocation of the site for mixed uses not employment only.

ROS 005 Rosyth Europarc 3, ROS006, ROS007 Rosyth Europarc 1, ROS008, ROS009, ROS010 Rosyth Waterfront 3, ROS011 Admiralty Park, ROS13

Scottish Enterprise (1873, 1876, 1878, 1883, 1887, 1890, 1899, 1893): Retain the allocations of all land within the entire Rosyth Port and the immediate hinterland area as safeguarded and proposed strategic employment sites

ROS 006 Rosyth Waterfront 1

Scarborough Muir Group (1029): Seek allocation of the site for mixed uses not employment only.

ROS 007 Rosyth Europarc 1

Scarborough Muir Group (1030): Seek allocation of the site for mixed uses not employment only.

ROS 008 Rosyth Europarc 2

Scarborough Muir Group (1031): Seek allocation of the site for mixed uses not employment only.

ROS 009 Rosyth Waterfront 2

Scarborough Muir Group (1034): Seek allocation of the site for mixed uses not employment only.

RSPB Scotland (2827) Seek reassurance about mitigation for SPA.

ROS 010 Rosyth Waterfront 3

Scarborough Muir Group (1035): Seek allocation of the site for mixed uses not employment only.

ROS 012 Rosyth Waterfront 4

Scarborough Muir Group (1035): Welcome allocation of leisure or community uses as set out in the Proposed Plan but seek map notation consistency and adjacent employment allocations for mixed uses.
Scottish Enterprise (1901): Allocate Proposal ROS012 for Tourism/leisure/community uses.

ROS 016 Castlemillhill (North)

John Winton (73), David Dykes (370), Georgina Tallis (213), Cathie Dykes (371), Ralph Payne (311), Judith Payne (513), Alex Mackie (1337), Naomi Payne (356), Stephen & Catriona Bennett (883), Colonel and Mrs C P C Sloan (568), S McHatton (891), David Fisken (1011), Kevin Borthwick (1017), Mark Graham (1022), G Forbes (1028), Norma Brown (1036), Susan Potter (1041), Wendy Laing (1071), G Watt (2392), Rosyth Community Council (1754), June Barenbrug (1217), Martin Rogers (1923): Seek deletion of site allocation.

ROS 017 Castlemillhill (South)

Colonel and Mrs C P C Sloan (661), Stephen & Catriona Bennett (881), S McHatton (889), Steven Murray (896), David Fisken (899), Kevin Borthwick (1015), Mark Graham (1021), G Forbes (1027), Norma Brown (1032), Susan Potter (1040), Wendy Laing (1072), G Watt (2394), Martin Rogers (1928): Seek deletion of site allocation.

TORYBURN

Torryburn Issues

BP North Sea Infrastructure (1256): Map and reference pipeline including consultation zone.

COUNTRYSIDE AREA

Cruicks, Quarry, Inverkeithing

Lafarge Tarmac (3718): Remove the green infrastructure opportunity designation from Cruicks Quarry (Candidate site ref LDP-INV001). Provide protection for the continued use of the wharf in connection with the operation of the quarry.

Crombie Issues

John Wilson (1293), West Fife Villages Community Council Forum (2811), West Fife Villages Community Projects Group (2820): Include a site for housing land at Crombie.

LWD 011 & LWD012 Longannet Power Station W

Scottish Power Generation Ltd (1776): Safeguard the entire Longannet site for employment purposes related to energy and related uses and boundary amended accordingly.

Summary of responses (including reasons) by planning authority:

Note: Where a number of representations were received to sites a conjoined response has been prepared covering the various issues raised within the individual representations.
**CHARLESTOWN**

**CHL 001 (Land at Scottish Lime Centre), CHL 002 (Land at the Old School)**

An adequate employment land supply allows businesses to grow, invest and create jobs. The allocated provision is therefore important in terms of the quantity of land available, but it is also essential that the supply provides for a wide range of quality offering a breadth of choice, and that it is located in the right places to meet the needs of employers and communities alike, as indicated in Scottish Planning Policy - 2014 (CD1, Page 26). The allocations made are considered to be modest for the size of the settlement, providing for local needs. The draft Dunfermline & West Fife Local Plan Examination report (CD21 page 104) also discussed this site and concluded that safeguarding the land for employment uses and future expansion of the Lime Centre was appropriate.

**CHL 003 Land at Charlestown Harbour (Ballast Bank)**

This site has been recognised within FIFEplan Proposed Plan as a development opportunity and allocated as such with appropriate development requirements stated (CD5, Page 43) Fife Council does however invite the Scottish Government reporter to consider making a recommendation on this issue as it applies to the proposal/s in question and to consider recommendations on the land uses highlighted by the respondent within the stated development requirements. This site could contribute towards meeting the SESplan housing land requirement in addition to securing local regeneration and protection or enhancement of built heritage.

Support for the suggested flood and water attenuation mitigation noted by Fife Council.

**CHL004 Conservation Area Extension**

This allocation is made to reflect a change in the existing designation area and as such does not necessarily imply a development proposal or loss of the woodland noted will occur.

**CULROSS**

**Culross Issues**

The non-inclusion of Fife Local Development Plan Development Strategy Consultation Candidate Site LDP-CUL001 was a result of site assessments (CD 13) conducted on all potential development sites before their inclusion in the Proposed Plan. These assessments were undertaken in accordance with Section 5(3) (a) of the Environmental Assessment (Scotland) Act 2005. The SEA Environmental Report assesses the potential significant environmental impact of implementing the policies and proposals contained within the Plan across a number of themes - this includes landscape. It is considered that development would detract from the landscape setting and is considered to be poorly located in terms of settlement integration and access.

Alterations to the settlement boundary within the Proposed Local Development Plan have been made in accordance with site assessments conducted and to reflect the future growth considered appropriate within the settlement. Culross is not identified as being within an area of strategic growth nor a location which is considered capable of
accommodating new development without significant detrimental impact on the setting of the settlement and surrounding landscape.

**DALGETY BAY**

**Dalgety Bay Issues**

Fife Council’s Executive Committee at its meeting on 9th September 2014 resolved to delete DGB003 (Barns Farm) from the Proposed Plan (CD23 Minute of September 2014 Executive meeting)

The Fife Employment Land Strategy (CD18) sets out the essential elements required to ensure that an adequate supply of available employment land is provided in Fife including in important locations with large existing employment activity such as Hillend and Donibristle Industrial Estate (HADIE), Dalgety Bay. The Fife Employment Land Strategy is based on Scottish Government priorities through economic strategy and planning policy at national, regional and local level, to create sustainable economic growth. In order to ensure Fife Council contributes to this aim, facilitating an effective supply of available land for employment is one of our important economic development functions. DGB002 is an allocation for 50 houses following the reporters’ decision on 2012 Draft Dunfermline and West Fife Local Plan examination (CD21- page 145). The allocation now shown within FIFEplan reflects the Reporters’ decision of that time. Other candidate site locations within HADIE have been assessed and were considered to better provide for future and existing employment activity. The introduction of non-employment uses could be incompatible with existing employment activity eroding the supply of strategic employment land and the proper functioning or expansion of that employment land contrary to the strategy of the Fife Development Plan.

**DGB 001 OCLI, Donibristle Industrial Estate**

Housing capacities stated are indicative and reflect the total capacity of the site in question. The allocation of the site was considered suitable for residential development that can contribute to the SESplan housing land requirement.

Fife Council considers that there may be merit in amending the developer requirements for the site to ensure that no development should be within 10m of the adjoining woodland area, and invites the Reporter to make an appropriate recommendation on this issue. Such an approach would be consistent with developer requirements identified for other sites in the plan. Appropriate survey work will require to be carried out as part of any planning application for the site.

**DGB 004 St David’s Harbour – Harbour Place**

This site is allocated in the Proposed Local Development Plan, for residential development in line with the planning permission and decision of the Court of Session during 2013 (SD6 Court of Session Ruling [2013] CSIH 109 XA175/12). The site was identified as a ‘reasonable alternative’ at the time of the Development Strategy consultation (December 2013). The FIFEplan strategy is to support and promote the economy of rural areas including the Fife coast and countryside providing for housing, leisure and recreational development opportunities in suitable locations (CD5, Page 13, Paragraph 26). Potential impacts identified by respondents to FIFEplan have in many cases been addressed through scrutiny and decision of the planning application (SD7...
Decision Notice Reference 12/00662/FULL). The site is therefore identified within the Local Development Plan as a suitable location for development with land uses stipulated in line with the planning permission and Court of Session decision. Fife Council does consider that as such, there may be merit in the Reporter recommending amendment the proposal description to reflect the planning permission.

Fife Council considers that there may be merit in amending the developer requirements for the site and invites the Reporter to make an appropriate recommendation on this issue acknowledging the granting of planning permission for the mixed use redevelopment (SD1 Decision Notice Reference Application Ref: 13/02953/PPP) with scope for class 1, 3, 4, and 11 uses.

**INVERKEITHING**

Inverkeithing issues

Inverkeithing contributes to the economy and housing needs of South Fife and more generally the Forth Estuary and SESplan area however it is not a strategic development area within SESplan (CD2). The Local Development Plan (CD5 Page 15) highlights the town’s location within and connections to, Central Scotland and the potential for offshore or energy related development consistent with National Planning Framework 3. The site in question is that of a former paper mill allocated within FIFEplan Proposed Plan for employment uses (INV009). The site is considered to be constrained for residential development given the proximity to an operational recycling facility and a rail line. Protecting existing employment uses and promoting the reuse and redevelopment of vacant sites is however important as is ensuring that new development is of a high quality with the best possible access and amenity.

Fife Council’s Executive Committee at its meeting on 9th September 2014 resolved to delete candidate site LDP-INV002 Spencerfield from the Proposed Plan (Minute of meeting CD23).

**INV 001 (Borelands Reservoir), INV 006 (Belleknowes Industrial Estate 1), INV 007 (Belleknowes Industrial Estate 2), INV 008 (Belleknowes Industrial Estate 3), INV 009 (Former Caldwell Mill)**

SEPA (3473, 3474, 3475, 3476, 3477): Support for the flood mitigation noted by Fife Council.

**INV 004 Former Inverkeithing Primary School, Roods Road**

Roy Green (1720): Support for the settlement boundary lineation noted by Fife Council.

**INV 009 Former Caldwell Mill**

Where possible, when identifying locations for new housing and other uses, Fife Council considers the re-use of previously developed land before development on greenfield sites, in line with Scottish Planning Policy (CD1 Page 13, Paragraph 40). The Local Development Plan provides for a mix of brownfield and greenfield sites to provide sufficient choice for the market to deliver the developments an area needs. Strategic
Development Areas that are being promoted through FIFEplan have emerged through the spatial strategy assessment that was undertaken by SESplan, have been consulted upon, examined by an independent Reporter and agreed by committees of SESplan member authorities. The site in question is that of a former paper mill allocated within FIFEplan Proposed Plan for employment uses (INV009). The site is considered to be constrained for residential development given the proximity to an operational recycling facility which can generate noise pollution and a rail line. Protecting existing employment uses and promoting the reuse and redevelopment of vacant sites is however important as is ensuring that new development is of a high quality with the best possible access and amenity.

INV 012 Fraser Avenue

Fife Council considers that there may be merit in amending the developer requirements for the site and invites the Reporter to make an appropriate recommendation on this issue acknowledging an area of known flood risk and the need for technical assessment.

KINCARDINE, NEW ROW & TULLIALLAN

Kincardine, New Row and Tulliallan Issues

Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process and will continue to be involved as detailed discussion occurs on the submission of any planning application. Policy 4 Planning Obligations of FIFEplan (CD5 Page 204) also sets out the requirements for all new development in which the Council will seek appropriate contributions from developers towards adequate infrastructure.

The Council will seek either the direct provision of requirements by developers or contributions towards their cost if these are to be provided by others.

The need to address Fife’s housing and employment needs has been considered against the need to protect its environment. This was the purpose of the site assessment process (CD15) and it underpins the policies of the Local Development Plan.

The site is question was a location identified for development (KCD002, KCD003 KCD006, KCD008 and KCD011) within the adopted Dunfermline & West Fife Local Plan 2012 (CD8) but was removed reflecting advice from the Scottish Environment Protection Agency. It is accepted that this advice has now been revised and mitigation agreed in considering planning application reference 14/03756/PPP (SD8). Further detailed discussions will also be required on the employment land/business park provision but it is anticipated that this will be 8.5Hectares consistent with the adopted Local Plan. Taking all this into account Fife Council considers that there is merit in allocating the site consistent with the planning consent and invites the Reporter to consider making a recommendation on this issue.

KCD 004 Kincardine Multi Storey Flats

In forming the settlement strategy for FIFEplan, whilst it is inevitable that some woodland will be effected in allocating the land required to meet the SESplan housing requirement,
Fife Council has considered through the site assessment process (CD15) the impact of the various options on prime quality agricultural land, woodlands and open space or countryside seeking to minimise loss. Taking all of this into account, Fife Council considers that there is merit in the Woodland Trust comments where these can be reflected in the development requirements and invites the Reporter to make an appropriate recommendation on this issue.

KCD 006 Kincardine Power Station 4 East

This allocation was made within the Proposed Plan to support the safeguarded employment designation adjacent and to reflect the Fife Employment Land Strategy (CD18) in proactively providing for land for future employment use. In light of representations provided concerning the operational nature of the existing safeguarded employment area and proximity to Firth of Forth SPA, Fife Council considers that there is merit in the comments and invites the Reporter to make an appropriate recommendation allocating the land for employment use or low carbon uses and strengthening references to the precautionary approach. Housing is not considered to be an appropriate or compatible use.

KCD 011 North Approach Road

Where possible, when identifying locations for new retail or commercial development, Fife Council considers the re-use of previously developed land before development outwith identified town centres, in line with Scottish Planning Policy 2014 (CD1 Page 13, Paragraph 40). In order to conform to SESplan Strategic Development Plan requirements, however, it has been necessary to identify this edge of town centre site in the Local Development Plan to provide sufficient choice for the market to deliver the developments an area needs. This is considered to be consistent with the sequential approach as set out in Scottish Planning Policy 2014 (CD1 Page 20, Paragraph 68) and to reflect sustainable development by providing for local needs & walkable neighbourhoods.

KCD 015 Kirk Brae

The proposed extension to the conservation area in Kincardine is based on an appraisal carried out by consultants (Gray, Marshall & Associates) which recommends that the conservation area boundary ‘should be adjusted to include 2 small areas and two large areas of merit.’ (see SD 9 Kincardine Outstanding Conservation Area Appraisal and Conservation Area Management Plan, page 45). These areas are mapped in SD 9 Appendix 1 and reasons for their inclusion are outlined in SD9 section 5.4.1 on page 47. Fife Council does not consider that it would be appropriate to revise the conservation boundary further without sufficient justification.

ROSYTH

Rosyth issues, ROS 005 (Rosyth Europarc 3), ROS 006 (Rosyth Waterfront 1), ROS 007 (Rosyth Europarc1), ROS 008 (Rosyth Europarc2), ROS 010 (Rosyth Waterfront 3), ROS 012 (Rosyth Waterfront 4)

The Fife Employment Land Strategy (FELS) (CD18) has informed preparation of the Proposed Plan (CD 5) and sets out the essential elements required to ensure that an adequate supply of available employment land is provided in Fife. This includes
supporting important locations with large existing employment activity such as Rosyth Port, Europarc and waterfront. The Proposed plan is also informed by National Planning Framework 3 (CD31) and SESplan Strategic Development Plan 2013 (CD2) which recognise Rosyth Port as an area of national and regional significance. These documents all recognise Scottish Government priorities to create sustainable economic growth.

In order to ensure Fife Council contributes to this aim FIFEplan has identified sufficient land at Rosyth waterfront to meet existing and future business needs in addition to ensuring that the transport links by both road, rail and sea are not prejudiced by non-employment uses. FIFEplan designations promote a proactive vision for Rosyth which is employment and trade focussed whilst recognising the value of ancillary leisure or commercial activity to serve local business or tourist activity. Rosyth waterfront has been recognised through successive Local Plans (2002 and 2012) as a strategic location within the Forth estuary serving Scotland and beyond by virtue of the existing deep water ports and the potential rail freight connections. Mixed uses are already provided for within FIFEplan Proposed Plan with the allocation of a 6.4ha site (ROS12) for leisure, commercial and limited retail floorspace development.

Fife Council’s Executive Committee at its meeting on 23rd June 2015 (CD59 - Committee Minute/Motion) agreed to note that the FIFEplan had also been informed by studies and strong local representations received on the potential for land uses and development at Rosyth waterfront and agree that the Council’s position was that the waterfront remained a nationally important economic asset and so the economic designation would remain. However, it was recognised that the site had been stagnant for a prolonged period of time and that it was therefore appropriate to consider opportunities for a broader range of mixed use development options that would complement the waterfront’s role as a European gateway for trade, commerce, and tourism and reflecting the potential of this area emerging from the forthcoming designation of the Forth Bridge as a world heritage site. As such a development framework was being prepared to support the regeneration of the waterfront allowing the Council to assess and consider and promote the best use of the site.

Issues including the potential significant environmental impact of implementing the policies and proposals contained within the Plan across a number of themes including habitats are dealt with through the Habitats Regulations Appraisal - which accompanies FIFEplan Proposed Plan (Annex 6 of FIFEplan’s Strategic Environmental Assessment, Environmental Report - CD17). The Plan has therefore been assessed for the extent to which its proposals affect the Firth of Forth SPA and mitigation identified. Detailed assessment will also occur at planning application stage should development proposals emerge.

Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision.

Non Inclusion of site adjacent to Hillwood Terrace, at Hilton and at Rosyth Park Rosyth

The non-inclusion of Fife Local Development Plan Development Strategy Consultation
Candidate Site LDP-ROS007, ROS002 (a and b) and ROS001 was a result of site assessments (CD 13) conducted on all potential development sites before their inclusion in the Proposed Plan. These assessments were undertaken in accordance with Section 5(3) (a) of the Environmental Assessment (Scotland) Act 2005. The SEA Environmental Report assesses the potential significant environmental impact of implementing the policies and proposals contained within the Plan across a number of themes - this includes integration, landscape impacts and access. In the case of employment land proposals the Fife Employment Land Strategy indicates sufficient provision of employment land in this general location to serve current need.

**ROS 002 Brankholme Lane**

Fife Council considers that there is merit in the comments made by the respondent and invites the Reporter to make an appropriate recommendation amending the stated text.

**ROS 003 Cochranes Hotel**

Mixed uses are already provided for within FIFEplan Proposed Plan with the allocation of a 6.4ha site (ROS12) for leisure, commercial and limited retail floorspace development.

**ROS 004 Primrose Lane 2**

The allocation of this site including the structural landscaping and the requirement for flood risk assessment reflects the adopted Local Plan (CD8) and recommendations made at that time by the Scottish Government reporter. (CD21, page 350)

**ROS 016 Castlelandhill (North)**

Where possible, when identifying locations for new housing and other uses, Fife Council considers the re-use of previously developed land before development on greenfield sites, in line with Scottish Planning Policy 2014. In order to conform to Strategic Development Plan requirements, however, it has been necessary to include greenfield development sites in the Local Development Plan. In forming the settlement strategy for FIFEplan, whilst it is inevitable that some prime agricultural land will be used in allocating the land required to meet the SESplan housing requirement, Fife Council has considered (through the site assessment process) the impact of the various options on prime quality agricultural land and has sought to minimise its loss. Similarly new development will be assessed in detail against FIFEplan Proposed Plan policies which include provision for ensuring good design, providing sufficient infrastructure or services to meet additional needs and to provide improved drainage or water attenuation measures before new development occurs. Existing field drainage or retaining walls will be safeguarded or enhanced as development occurs.

**ROS 017 Castlelandhill (South)**

Safeguarding and improving the environment and the tourism that derives from that are central to the Local Development Plan Strategy. The proposed opportunity for hotel and visitor accommodation capitalises on the environment and accessibility of the Forth Bridgehead helping to boost visitor spend and related economic activity within Fife. Land uses will however be limited to exclude retail provision and required to demonstrate high quality design and suitable access arrangements. Consultation will occur at planning application stage with the Health and Safety Executive to ensure that proposed
development has no adverse impact on the identified consultation zone. FIFEplan has also been informed by consultation with Council Services such as Transportation and Education, along with external partners and organisations such as the Health and Safety Executive.

**Torryburn**

**Torryburn Issues**

The Health and Safety Executive provide regular updates to constraint data held by Fife Council including mapped location of hazard installations and pipelines. Consultation will occur at planning application stage with the Health and Safety Executive to ensure that proposed development has no adverse impact on the identified consultation zone. FIFEplan has also been informed by consultation with Council Services such as Transportation and Education, along with external partners and organisations such as the Health and Safety Executive. It was not otherwise considered appropriate to publish the relevant mapping of consultation zones.

**Countryside Area**

**Cruicks Quarry, Inverkeithing**

The green network opportunity identified at Cruicks Quarry represents the longer-term opportunities to enhance the Green Network in relation to the restoration of the Cruicks Quarry site; this opportunity is set out in the Green Networks in Fife Report (see SD2 page H-65) but is not included as a green network priority in FIFEplan (given its longer term status). It is considered useful to show this opportunity on the green network mapping in FIFEplan to present the full picture of green network opportunities in Fife. Fife Council considers that the identification of this long term opportunity would not have a negative impact on the current operations of the quarry.

Protecting existing uses within Inverkeithing Bay will enable the reuse and redevelopment of vacant sites and protect the operational requirements of existing businesses.

**Crombie Issues**

Non allocation of land at Crombie – the issue is addressed in the west area strategy text issue 3b. A site specific response detailing further reasons for exclusion is provided within Fife Council Executive Committee report (CD58).

**LWD 011&LWD012 Longannet Power Station W**

Fife Council considers that there is merit in the comments made by the respondent and invites the Reporter to make an appropriate recommendation on this issue.

**Reporter's conclusions:**

1. In the proposed plan, site CHL 001 is designated as “safeguarded employment”.

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Included in site CHL 001 is a narrow strip of ground between the old school building and Rocks Road. From my inspection, there appears to be no employment activity associated with this ground. There is thus no employment to safeguard.

2. In the proposed plan, the old school building is within site CHL 002. Site CHL 002 is allocated for housing. If the old school building is to be brought into residential use, it would not be appropriate for the ground between it and Rocks Road to be associated with employment use. This ground should be associated with the old school building and should have a “front garden” type of use.

3. To the south of the old school building and within site CHL 001 is no. 22 Rocks Road, a relatively modern bungalow. The representation says that it is in residential use. My inspection confirms this. It would not be appropriate to include this residential property in this particular “safeguarded employment” designation.

4. South of no. 22 Rocks Road is the Sutlery building, also in site CHL 001. This has a shop on the ground floor and residential use above. Residential appears to be the predominant use of this building. In view of this, it would not be appropriate to include it in the “safeguarded employment” designation.

5. I note the council’s reference to the 2012 local plan examination report. I find this of limited relevance. The situation has changed significantly in that the council is now proposing a housing allocation (site CHL 002) on a large part of what is an employment site (CHL 001) in the current adopted plan. The council expresses concern about loss of employment land. Given proposed housing allocation CHL 002, there is no potential for employment use on the small strip of land in front of the old school building or at the bungalow at no. 22 or at the Sutlery building.

6. For the reasons given above, my conclusion is that site CHL 001 should be reduced in extent so that it excludes (a) the strip of ground on the west side of the old school, (b) the bungalow at no. 22 Rocks Road, and (c) the Sutlery building (nos. 8 to 20 Rocks Road).

Charlestown - land at the Old School, site CHL 002

7. The representation seeks to extend site CHL 002 so that it includes the three parcels mentioned in the preceding paragraph. I agree that site CHL 002 should include the strip of ground on the west side of the old school. If the old school is to be brought into residential use, the strip of ground between it and Rocks Road should be part of the curtilage.

8. The site CHL 002 designation is primarily directed at securing new residential development. In view of this, I do not consider it appropriate to include in it properties which have established residential use. I therefore do not agree with the suggestion that 22 Rocks Road and the Sutlery building be included in site CHL 002.

9. My conclusion is that site CHL 002 should be extended to take in land on the west side of the old school building.

Charlestown - Ballast Bank, site CHL 003

10. The current adopted local plan identifies the Ballast Bank site as a development
opportunity. The explanatory text in the current plan is similar to text in the proposed plan. Text in the current plan also says that proposals for the site will be considered for inclusion in a future local development plan.

11. The representation asks that three types of use be identified as preferred uses on the site. One of the uses is residential. It is contended that the estimated residential capacity should be approximately 40 units.

12. I note from the proposed plan that the site is within a conservation area. The council’s site assessment indicates that the adjacent harbour is a category B listed structure and the inner pier is a scheduled monument. During my inspection, I noted the presence of imposing disused limekilns beside the harbour. Most of the kilns were fenced off for safety reasons. An information board indicated that the kilns too were a scheduled monument.

13. The site extends out into the inter-tidal area. It is of prominence within the harbour area of the village.

14. From the foregoing considerations and from observations during my site inspection, I find that the site is unusual and particularly sensitive. Any development on it should be of a design that is of high quality in itself and that preserves or enhances the character of the conservation area.

15. To demonstrate that the proposed preferred uses could be satisfactorily accommodated on the site, bearing in mind my findings in the preceding paragraph, some design work is essential. The reference in the current plan to proposals for the site being considered for inclusion in a future plan suggests to me an expectation that design work be undertaken to demonstrate acceptability before specific forms of development are given support in a future plan. The extent to which repairs to the harbour and kilns would be an integral part of the development would also require to be made clear.

16. I note the council’s apparent lack of opposition to the representation and the reference to meeting the housing land requirement. In my view, these considerations do not override the need to ensure that development on the site is of appropriate quality and style and the need to explore the extent to which new development should be accompanied by harbour and kiln repairs. The proposed plan does not prevent favourable consideration being given to appropriate proposals. As it is, the evidence submitted does not allow me to reasonably conclude that the plan should endorse the particular uses put forward in the representation.

17. In all the circumstances, I conclude that the proposed plan should not be altered.

Charlestown - Camsie House, site CHL 004

18. Site CHL 004 is identified as a conservation area extension. It does not propose or give support to development. I find that inclusion of site CHL 004 in the proposed plan does not represent a threat to ancient woodland. My conclusion is that the proposed plan need not be altered.
Culross - land east of Kirk Street

19. To aid my consideration of representation 1748, I made a request for further information (FIR 68).

20. The subject of representation 1748 is land on the south-east side of Kirk Street, Culross. Kirk Street connects the historic centre of Culross and Culross Abbey. From my inspection, I note that the site’s frontage to Kirk Street is about 90 metres long and that the site is very approximately 0.4 hectare in extent. There are substantial stone walls on the north-west, north and north-east boundaries of the site. The site slopes down from north-east to south-west and is grassed.

21. In the current adopted local plan, the site is within the Culross settlement envelope. It is also within the Culross conservation area. In the proposed plan, the settlement envelope has been redrawn to exclude the site.

22. The representation says that the proposed alteration to the settlement envelope is contrary to provisions in the Planning etc. (Scotland) Act 2006 and contrary to requirements in related circulars. From my reading of the act, I find nothing that prohibits Fife Council from proposing the settlement envelope alteration after publication of the main issues report. Section 18(1) in section 2 of the act requires that regard be had to representations made with respect to the main issues report. This suggests to me that the proposed local development plan may properly contain provisions that vary from what is set out in the main issues report.

23. Paragraph 67 of Circular 6/2013: Development Planning makes clear that the main issues report is not a draft version of the plan. It is to concentrate on the authority’s “big ideas for future development”, and on where development should and should not occur. In this context, I find that a matter on the scale of that of the proposed settlement envelope alteration at Culross is not something that should necessarily have been included in the main issues report.

24. I note that paragraph 80 of Circular 6/2013 says that the plan preparation stage is not one which should be used to “test the water”. This is in the context of new or controversial elements that should already have been aired at the main issues report stage. In my view, the proposed alteration to the settlement envelope boundary at Culross is not a new or controversial element of the kind to which the circular refers.

25. From the foregoing considerations, I find that the proposed settlement boundary alteration at Culross does not infringe statutory requirements or advice in Circular 6/2013.

26. The representation refers to the Culross Conservation Area Appraisal and Conservation Area Management Plan of November 2009. I note that this says, at paragraph 3.7.1, that, in the conservation area, two character areas are readily distinguishable. These are the Abbey area and the centre of the village. I find that the representation site is a major part of a relatively open area between the Abbey and the village. It contributes to the separate definition of these two distinct character areas. I find nothing in the appraisal and management plan that suggests that the conservation area would benefit from development on the representation site.

27. I note that the Culross settlement envelope boundary was reviewed during
preparation of the Dunfermline & West Fife Local Plan 2012. The council says that the
alteration now shown in the proposed plan was identified in a review of all settlement
envelope boundaries during plan preparation. No change in circumstances since the
previous review has been drawn to my attention. I find that lack of such change does
not inevitably prevent a boundary alteration. Identification of boundaries involves a
degree of judgement. Earlier decisions on boundaries may properly be scrutinised and
refined by making adjustments where appropriate.

28. The representation contends that including land east of Kirk Street within the
settlement envelope boundary would enable land use change to be managed through an
approach that is informed by an understanding of the settlement’s heritage and by
strategic objectives of the proposed plan. Provision on the site could include, for
example, car parking, public seating, new footpaths and modest infill development to
meet local needs. Policies in the plan would regulate quality and amenity standards. If
the site were excluded from the settlement envelope, policy would, in effect, prevent any
development with its potential benefits. A site appraisal shows that the site is an integral
and logical part of the settlement.

29. I find that the walls on the site boundary make a significant contribution to the
character of the conservation area. Development on the site such as housing and car
parking would be likely to require the opening up of accesses in the boundary walls.
This could well be detrimental to the character of the conservation area.

30. The site occupies higher ground, above the historic centre of Culross village. I do
not find that the site is an integral and logical part of the village. Rather, it is part of the
relatively open area between the Abbey and the village to which I have referred.
Development on it would weaken the separate definition of the two distinct character
areas.

31. Taking into account all considerations, my conclusion is that the proposed
boundary change is appropriate. The proposed plan need not be altered.

Culross - Blaimains, candidate site LDP-CUL001

32. Most of the east boundary of candidate site LDP-CUL001 adjoins Culross
conservation area. From my inspection, I note that there are some trees along this side
of the site. To the east of the trees there is a field. The field separates the site from the
main built-up area of Culross.

33. I find that development on the Blaimains site would have little or no direct effect on
the historic core of the conservation area.

34. There is a footpath on the east side of the site. This leaves the main road opposite
the public car park and goes north to the ruins of the mediaeval West Church and its
graveyard. Two paths branch off to the east. One leads to Culross. The other leads
towards the Abbey and the parish church.

35. The footpath on the east side of the site has a strongly rural character. Much of this
part of the path is below the level of the adjacent ground to the west. Where there is this
difference in level, development on the site would not be, or would barely be, visible from
the path. At the north-east corner of the site, development on the site would be fully
visible. Persons returning from the West Church would see the development through
36. I note the contention that development could be well-integrated with existing development at Balgownie West. The Balgownie West houses are beside the coast road. Behind them, the ground rises up fairly steeply. The Blairmains site has an altitude which is roughly twenty-five or thirty metres greater than that of the ground on which Balgownie West stands. The sloping ground between Balgownie West and the proposed development would separate the two and make it most unlikely that they could be integrated successfully.

37. To negotiate the steep slope, the sketch layout shows an access road slanting up and then entering a cutting. In my view, an access road could not be constructed without significant earthworks. This would result in a major intrusion into what is at present a pleasant landscape feature, glimpsed through spaces between the Balgownie West houses and an important part of their setting. Even with extensive earthworks, the access road would still be very steep and not convenient for day-to-day use.

38. Built development close to the southern part of the Blairmains site would be seen from Balgownie West as a skyline feature and would detract from the pleasant quality of the local landscape.

39. The southwards outlook from the Blairmains site is towards the rear gardens and rear elevations of the Balgownie West houses. The separation distance would be sufficient to avoid unacceptable loss of privacy, but I find it hard to see how this relationship between the site and the existing houses would facilitate good integration.

40. It is contended that the proposed development would help maintain the school. Submissions do not demonstrate that the school might otherwise close. I note the reference to reinvestment in local business and support for new employment opportunities. No details have been provided regarding the amount of reinvestment, what it might achieve and for how long it would have an effect. I find that these points add little weight to the case in favour of development on the Blairmains site.

41. I accept that development on the site could be well-contained, would not cause coalescence, could include a replacement community facility and, by bringing in new residents, could help maintain local services such as shops.

42. I find that the advantages associated with development on the site are of limited substance compared to the disadvantages. The disadvantages include creation of an enclave of development in what is essentially a countryside area, lack of satisfactory integration with Balgownie West, intrusion into a pleasant local landscape feature, poor access due to a steep gradient and a detrimental effect on the pleasant rural ambience of nearby footpaths. My conclusion is that the disadvantages clearly outweigh the advantages. The proposed plan need not be altered.

Dalgety Bay - Barns Farm, candidate site LDP-DGB001

43. In representation 1843, Persimmon Homes (East Scotland) contends that the Barns Farm site should be identified for housing development. Correspondence received in December 2015 indicated that the owner of the site no longer wished to sell it for housing development. Following a request for further information (FIR 21), Persimmon Homes (East Scotland) intimated that it does not wish to maintain its representation.
regarding this site. In view of the circumstances, I find that there is no need to alter the proposed plan with respect to the Barns Farm site.

Dalgety Bay - 24 Ridge Way, candidate site LDP-DGB002

44. Candidate site LDP-DGB002 at 24 Ridge Way is part of the Hillend and Donibristle Industrial Estate. In the proposed plan, the site and adjoining land are designated as a safeguarded employment area. Representation 2017 says that the site should be designated as a development opportunity site for housing, business and employment uses. Representation 103 also supports housing development at 24 Ridge Way. To aid my consideration of the representations, I made a request for further information (FIR 56).

45. From my inspection, I note that the candidate site at 24 Ridge Way contains a group of brick-built buildings and a more recent large single-storey building. All are disused and appear to be in a fairly poor state of repair. Their condition and, certainly with regard to the brick-built buildings, their internal layout, are likely to be unattractive to potential occupiers. I accept the contention that there is no market demand for such premises.

46. Redevelopment of the site as suggested in the representation was to have included construction of a 10,850 square feet building for occupation by a company that, at the time of the representation, had temporary use of part of the existing premises. The company vacated the premises in September 2015 and is committed to a five-year lease in its new location. In its letter of 1 June 2015, the company refers to a lack of high-quality mixed office/light industrial facilities.

47. The representation includes an indicative site layout plan, dated June 2014. This shows a possible redevelopment of the site. The proposed commercial building is shown within the north-west part of the site. The remainder of the site contains 56 dwellings.

48. During my inspection, I noted that there is a stand of trees in the easternmost part of the site. The east side of the site adjoins the rear gardens of a housing development. To the north of the site, on the other side of Ridge Way, there are business and factory units. More business and factory units adjoin the south side of the site. To the west there is a recycling centre with a frontage on to Ridge Way and a grassed area which occupies sloping ground.

49. I find that the site is an integral part of the Hillend and Donibristle Industrial Estate. Use of the site primarily for housing would create a residential intrusion into an area dominated by commercial and industrial activity. The amenity of the proposed houses could well be adversely affected by noise, fumes or other effects arising from nearby industrial and other activity. Such activity could disturb occupiers of the proposed houses and give rise to complaints. This could have an adverse effect on the ability of businesses to function efficiently.

50. I note the conflicting submissions regarding demand for business and industrial development. I find that projections of future demand based on activity in previous years are of limited value. National and international economic conditions have fluctuated considerably in the last ten years or so and are likely to have a significant influence. The hope now is that the effects of the financial crisis of 2008 are receding and that
confidence in investment will increase. “Average” annual rates of activity within a relatively small area such as the Dalgety Bay and Hillend area are distorted by implementation at irregular intervals of larger developments and are of limited use in deciding what may happen in future years.

51. The representation site has a favourable location within the Hillend and Donibristle Industrial Estate. It has a long frontage to one of the main roads through the estate and an open outlook to the south. A large proportion of the site is reasonably level.

52. The representation, in relation to delivery of new housing, says that Dalgety Bay is well-situated within the Forth Bridgehead area, with excellent accessibility. I find that this accessibility also means that the Hillend and Donibristle Industrial Estate is well-placed to attract new commercial and industrial development.

53. I find that the Hillend and Donibristle Industrial Estate has an important role to play in providing opportunity for residents to work locally. This reduces the adverse environmental and social effects of longer-distance commuting. Use of the representation site largely for housing would be likely to have an opposite effect.

54. I note that the site has been marketed and that, to date, this has not been successful. From submissions, it appears to me that demand for larger sites or larger premises arises from time to time. It is therefore not possible to say that a potential occupier will be identified within a given period of time. This does not justify permitting some other development on the site and losing for all time its potential to be a place where people may find employment.

55. I note the contention that there is an over-generous supply of employment land in Fife. Even if this is so, it does not necessarily justify removal of the representation site from that supply. If the employment land supply were needing to be reduced, I would expect there to be an assessment of the merits of the “surplus” sites and elimination of those sites with least merit. I am not convinced that the representation site would be in the least-merit category.

56. The representor’s Further Submission dated 15 March 2016 says that retention of the site within employment use would serve simply to stymie its redevelopment prospects, the inevitable result being continuation of the existing situation, with the properties falling further into disrepair. I do not accept this as a justification for reallocating the site. It is the responsibility of owners to maintain their propery in an acceptable condition, and this can be enforced in terms of section 179 of the Town and Country Planning (Scotland) Act 1997. Maintaining the site in a good condition might have the added benefit of making it more attractive to a prospective developer.

57. In summary the site is an integral part of the Hillend and Donibristle Industrial Estate. The estate has an important function in providing opportunity for residents to work locally. The site makes a valuable contribution to the employment land supply in that it is well-placed within the industrial estate. The estate itself is in an accessible location. The proposed housing, business and employment uses, with housing predominating, would greatly reduce the extent to which development on the site could be a source of employment. The amenity of residential development on the site could be adversely affected by nearby industrial activity. The presence of houses could impact on the operation of nearby businesses.
58. I note the contention that the proposed plan does not provide an adequate supply of housing land. I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the five-year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under Issue 2(b) Homes with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that the proposed development on the site would nevertheless be unacceptable for the reasons given in the preceding paragraph. These reasons outweigh the benefits of addressing any shortfall in the supply of housing land.

59. I conclude that the site at 24 Ridge Way should not be designated as a development opportunity site for housing, business and employment uses. The site should continue to be designated as a safeguarded employment area. The proposed plan need not be altered.

Dalgety Bay - OCLI, Hillend and Donibristle Industrial Estate, site DGB 001

60. The council says that the estimated capacity given in the proposed plan is the estimated capacity of the whole site. I note that the proposed plan says that the site has planning permission and is under construction. From my inspection, it appears to me that development on the site is now complete. In view of this, the text for DGB 001 should be brought up to date. This can be done by the council without formal modification and would address the concern in the representation.

61. Regarding provision of a ten-metre buffer between development and adjacent woodland, as development is complete, I see no point in adding to the proposed plan any reference to a buffer.

Dalgety Bay - St David’s Harbour - Harbour Place, site DGB 004

62. Text associated with site DGB 004 in the proposed plan refers to planning appeal PPA-250-2114-1. The result of this appeal was that, on 20 June 2014, planning permission was granted for the erection of 24 flats and associated amenity space, a restaurant/bistro, parking, a lighthouse, walkway, landscaping and vehicular access. Prior to granting planning permission, the reporter appointed to consider the appeal issued, on 22 April 2014, a notice of intention.

63. Among the matters addressed in the notice of intention was amenity. The reporter concluded that the proposed development had been sensitively designed and would conserve the amenity of the area. I find no reason to disagree with this conclusion and so I do not accept the contention that the housing element of the proposed development on the site would necessarily detract from its surroundings.

64. The representation refers to the existing number of pubs and restaurants in Dalgety Bay, questions the long-term viability of such a proposal and expresses concern about noise pollution and anti-social problems.

65. I note that the proposed plan refers to “restaurant” and “restaurant/bistro” rather than to a “public house”. From my inspection, I note that the wider surrounding area is predominantly residential. I find that a restaurant/bistro on site DGB 004 would not result in any excessive proliferation of such development in this area. Nor would it inevitably cause noise and anti-social problems. Its viability is a not a planning matter in this instance.
66. My conclusion is that the proposed plan need not be altered in response to the representation.

67. Amendment of the proposal description is suggested by the council. As this is not raised in a representation, such amendment is outwith my remit. The council may wish to consider whether an amendment to the description might be permissible as a non-notifiable minor wording change.

Dalgety Bay - Hillend and Donibristle Industrial Estate, Western Edge, site DGB 007

68. In the proposed plan, the “Description” for site DGB 007 is “employment”. A letter dated 5 January 2015 intimates that the council has resolved to grant planning permission in principle for a mixed use development on the site. The proposed development comprises the erection of a Class 1 retail unit, erection of restaurant with licensed bar (Class 3), erection of a drive-thru restaurant (Class 3), erection of a business unit (Class 4) and children’s indoor play area (Class 11) with associated works including access, car parking and landscaping. In view of this, I find that it would be appropriate to amend the description and to mention the intended grant of planning permission.

Inverkeithing - Spencerfield, part of candidate site LDP-INV002

69. The representation (1917) seeks allocation of land at Spencerfield as a residential (circa 295 units) and associated open space/recreational land use proposal. The location and boundary of the site are indicated in figure 29 on page 47 of the Masterplan Report dated December 2014. The site has an area of 15.4 hectares.

70. Three further information requests (FIR 20, FIR 28 and FIR 74) are associated with this site.

71. Land at Spencerfield is a candidate site (site reference LDP-INV002). The candidate site takes in the representation site and land to the south and south-east. It has an area of 24.3 hectares. The site assessment conclusion for candidate site LDP-INV002 says that residential development on the site is supported. It says the site could contribute 330 houses. Issues such as landscape, coalescence and access to facilities need to be taken into account and for this reason an area to the south east should be excluded. The assessment conclusion goes on to say that on 9 September 2014 the council’s Executive Committee resolved to delete the site from the proposed plan.

72. The representation site is the subject of a planning application that has led to planning appeal PPA-250-2232. The reporter appointed to determine appeal PPA-250-2232 is minded to allow the appeal. The planning appeal site is the same as the 15.4 hectare site mentioned above.

73. Appeal PPA-250-2232 arises from a planning application in principle. The notice of intention says that the development would consist of about 295 houses, of which 25 per cent would be affordable homes. Associated infrastructure would include access roads, sustainable drainage systems and landscaping. There would be two new vehicular access points, both taken directly from Hillend Road.

74. I note that, prior to this examination, some 14 representations were made in support of the council’s decision not to allocate site LDP-INV002 for development.
These included representations from Inverkeithing Community Council and from Dalgety Bay and Hillend Community Council. Representations have also been submitted to Planning and Environmental Appeals Division following the further information requests mentioned above. Concerns about development on the site include the following:

Inverkeithing would be extended to within 400 metres of the built-up area of Dalgety Bay.

There would be a large increase in traffic in close proximity to Inverkeithing Primary School and Inverkeithing High School.

Facilities such as schools and the doctors’ surgery are already overstretched.

Scottish Planning Policy states that redevelopment of brownfield sites is preferred to development on greenfield sites. There are at least 20 hectares of brownfield land within Inverkeithing.

There would be an adverse effect on biodiversity. The area has a variety of fauna and flora.

The SEPA flood risk maps clearly show that there is already a high risk of surface water and coastal flooding in the vicinity of Preston Crescent and Fraser Avenue.

Construction of the proposed development might take as long as ten years and will cause disruption to local residents.

75. I agree that development on the representation site would extend the built-up area of Inverkeithing to within 400 metres of the built-up area of Dalgety Bay. This relatively short distance suggests that the two communities might be about to coalesce. In fact the two built-up areas would continue to be separated by the elongated, if not especially high, Letham Hill as well as by a strip of agricultural land. Letham Hill is well-wooded. I find that these features would continue to provide a distinct separation between Inverkeithing and Dalgety Bay. My conclusion is that development on the representation site would not cause coalescence.

76. The site assessment for candidate site LDP-INV002 says that a transport assessment is required. Included in the representation is a transport assessment, dated December 2014. The assessment (page 58) concludes, among other things, that the development could be satisfactorily accessed and that surrounding junctions would continue to operate within capacity. I am not aware of any submission that demonstrates these conclusions are unsound. I conclude that, notwithstanding the representation site is close to two schools, traffic from development on the site could be satisfactorily accommodated on the surrounding road network.

77. The site assessment for candidate site LDP-INV002 indicates that there is capacity for additional pupils at Inverkeithing Primary School but there would be an increased over-capacity risk at the other schools affected. The assessment does not identify any particular problem in providing increased capacity if funding were available. The representor’s Statement in Support of the Formal Objection (December 2014), with respect to any necessary increase in school capacity, says (paragraph 2.14) that discussions in connection with recent planning applications confirm that “a proportionate financial contribution will be sought by the Council.” Taylor Wimpey is “agreeable to this
approach”. From this, I conclude that any problem regarding school capacity could be resolved.

78. Regarding pressure on health care facilities, it has not been demonstrated that this is a problem peculiar to Inverkeithing. Nor has it been shown that development could be directed to other communities where health care facilities have spare capacity.

79. I note that there is a significant amount of brownfield land at Inverkething. The current adopted local plan identifies three brownfield sites which could be used, among other things, for new housing. These sites, as identified and numbered in the current plan, are Caldwell Mill (INV 010), RM Supplies (INV 011) and Prestonhill Quarry (INV 012). I agree that Scottish Planning Policy (paragraph 40) gives preference to development on brownfield sites.

80. Another important factor identified in Scottish Planning Policy (paragraph 119) is that land allocated for housing must be effective. From what is said in paragraph 2.3 of the Statement in Support, it appears that the three brownfield sites are not effective. I note that, in the proposed plan, they are no longer allocated for housing. I find it is unlikely that, during the period covered by the proposed plan, other, brownfield, land in Inverkeithing will be developed for new housing on the scale envisaged at Spencerfield.

81. Regarding effect on biodiversity, the Ecological Assessment 2014 prepared by Nigel Rudd (November 2014) (paragraphs 3.27 and 3.28) says that the habitat resource is simple in structure and low in species diversity. The arable management maintains a species-poor habitat resource. No evidence was found of protected species using the site. From this, I conclude that development on the site would not have an unacceptable effect on biodiversity.

82. Regarding flood risk, the Drainage Assessment & Flood Risk Assessment (Ironside Farrar, December 2014) (paragraph 7.1) concludes that the site is located outside the 200-year flood envelope as detailed on the Indicative River & Coastal Flood Map published by the Scottish Environment Protection Agency. The site will not be at risk of flooding from the watercourse that crosses the site (a section of culvert should be removed). The site is at a low risk of flooding from other sources. An appropriately-designed sustainable urban drainage system should be incorporated into the proposed development. The assessment does not identify that the proposed development would increase flood risk elsewhere. My conclusion is that the site is suitable for development from the flood risk point of view.

83. I agree that construction can cause disruption to local residents. Conditions may be imposed on planning permissions to reduce any such disruption. For example, hours of working or noisy activities might be restricted to certain times of the day. Local authorities also have powers under other legislation to control possible disturbance. My conclusion is that disruption is not a reason for rejecting development on the site.

84. The Statement in Support of the Formal Objection (paragraph 2.10) says that allocation of land for residential development at Spencerfield can make an immediate and significant contribution to the five-year housing land requirement for the wider Council and Strategic Development Plan area.

85. I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the five-year effective housing land supply for the SESplan area of Fife. I also acknowledge
the uncertainties expressed under issue 2(b) Homes with regard to the level of this shortfall. Nevertheless, I consider it appropriate that this site should be allocated for housing in advance of the early review of housing supply recommended under Issue 2(b): Homes, for the following reasons:

the site is capable of delivering completions in the next five years;

when assessed against the wider policies of the plan, the proposed development would not have unacceptable adverse impacts which would outweigh the benefits of addressing any shortfall in housing land supply;

it would not undermine the strategy of the local development plan and would complement the delivery of existing committed development in the plan;

infrastructure constraints can be addressed; and

a structured environmental assessment process has been undertaken and there is evidence that public engagement has taken place.

86. My overall conclusion is that the 15.4 hectare site at Spencerfield should be allocated for housing and that the proposed plan should be altered accordingly.

Inverkeithing - Former Caldwell Mill, site INV 009

87. In the current adopted local plan (pages 96 to 98), the Caldwell Mill site is designated as a Brownfield Opportunity Site. The plan says that the site has “potential for housing redevelopment and business, commercial or leisure use subject to addressing the current noise and amenity issues at the scrap merchants opposite.” Development should be “designed to address any issues arising from any ongoing presence of adjacent scrap metal operations.” This is “likely to include the siting of non-residential units at bay frontages.”

88. In the proposed plan, the Caldwell Mill site is designated as an employment site. Text in the proposed plan indicates that the site should be used for class 5 (general industrial) and class 6 (storage and distribution) uses. Representations say that class 5 and class 6 uses are inappropriate. The representations seek a mixed use allocation, including business, commercial, housing and community uses.

89. In response to a request for further information (FIR 59), the council says that the original strategy for the Inverkeithing Bay Area within the Fife Structure Plan was based on RM Supplies’ scrap yard re-locating to enable development. As RM Supplies do not intend to relocate its operation the strategy for the area has changed to move away from residential development. This is due to the continued amenity issues arising from the scrap yard. Since 2000, the council has received 25 noise complaints about RM Supplies.

90. Regarding the railway that traverses the north-western edge of site INV 009, the council advises that it has not been used for several years. It is the council’s view that retention of the railway is essential to protect possible investment from companies that will benefit or rely on rail freight transport. The railway provides a connection to the Rosyth International Container Terminal (site ROS 013).
91. From my inspection, I note that access to and from the site involves use of roads
that are lined with residential and other development and that do not appear to be
particularly well-suited to present-day volumes of traffic.

92. Inverkeithing railway station is some 600 metres from the site. Local bus services
are available at the High Street, 200 metres from the site up a very steep footpath.

93. The site has an open frontage to the Inner Bay. From this frontage there are
attractive views, despite the presence of the scrap yard, quarry and other commercial
development.

94. My findings are as follows.

95. At present, the site is not suitable for residential development. This is because of
the presence of the scrap yard some 300 metres to the south of the site and the
presence, on the west boundary, of a railway that may be brought back into use.

96. Vehicle access to the site is less than ideal. Class 5 general industrial and, in
particular, class 6 storage and distribution could generate amounts and kinds of traffic
that would have a significantly detrimental effect on the environment of the affected
streets and adjoining dwellings.

97. The mill buildings have been entirely removed and the site is unused. It is relatively
large (8.2 hectares). Reuse of brownfield land is supported by national policy (for
example, paragraph 40 of Scottish Planning Policy) and by SESplan (paragraph 17).
The site provides an important opportunity for new development.

98. Traffic generated by class 4 business use is likely to be much less heavy than
traffic generated by class 5 general industrial and class 6 storage and distribution.

99. Proposals for class 4 business use on the site are likely to be less sensitive to noise
disturbance than proposals for residential use and are likely to have greater potential to
incorporate appropriate noise attenuation features.

100. Including class 4 business use in the uses envisaged for the site has several
advantages. It could reduce the proportion of heavy traffic going to and from the site. It
could generate a higher proportion of non-car journeys in view of the proximity of public
transport. These two factors would in turn reduce detrimental effects on nearby streets.
It could increase the prospects of attracting new development to what is a brownfield
site. Class 4 uses could derive greater benefit from the site’s attractive outlooks than
might class 5 or class 6 uses.

101. From my findings, my conclusion is that class 4 business use should be included
in the uses that are envisaged for the site. The proposed plan should be altered
accordingly. Class 5 and class 6 uses should be retained as possible uses for the site to
maximise its redevelopment prospects.

102. I note that the council’s response to the request for further information (FIR 59)
includes reference to access improvements including local road network upgrades. This
is not a requirement for site INV 009 as presented in the proposed plan and no
representation seeks inclusion of such a requirement. It is therefore a matter that is
outwith the scope of this examination.

363
Inverkeithing - Fraser Avenue, site INV 012

103. I note advice that the Fraser Avenue site is located in or adjacent to a functional flood plain or an area of known flood risk. Scottish Planning Policy (paragraph 256) says that the planning system should prevent development which would have a significant probability of being affected by flooding or which would increase the probability of flooding elsewhere. Reduction of functional floodplains should be avoided. Development on the proposed allocation site must conform to these requirements. To ensure this, a flood risk assessment should be carried out. Thereafter, design of development for the site should take into account the findings of the flood risk assessment. In view of this, it would be appropriate to require a flood risk assessment and the proposed plan should be altered accordingly.

Kincardine - Eastern expansion

104. Representation 3689 refers specifically to sites KCD 002 and KCD 003. In the adopted local plan that is in force at present, site KCD 002 is referred to as Kincardine Eastern Expansion Phase 1. Site KCD 003 is referred to as Kincardine Eastern Expansion Phase 2. They are allocated for housing. Total capacity is stated to be 490 dwellings, with 350 of these within the local plan period.

105. Sites KCD 002 and KCD 003 are not included in the proposed plan. This omission was based on advice from the Scottish Environment Protection Agency.

106. Since then, a flood risk assessment has been carried out and the advice from the Scottish Environment Protection Agency has been revised. In response to a request for further information (FIR 50), the Agency says that it has no objection to the proposed allocation of sites KCD002 and KCD003, subject to a site-specific developer requirement being attached to both proposed allocations, to the effect that a detailed flood risk assessment will be required as part of any future planning application. The Agency points out that both sites may be heavily constrained by flood risk. This can only be accurately quantified by a detailed flood risk assessment. Such an assessment might find that areas of the sites are unsuitable for development.

107. In its initial response, the council says that there is merit in allocating the sites in accordance with a planning permission that has been granted. In response to the request for further information (FIR 50), the council suggests text that might be inserted in the proposed plan.

108. Notwithstanding the cautionary comments from the Scottish Environment Protection Agency, my conclusion is that sites KCD 002 and KCD 003 should be allocated for housing development. The necessary text should be based on the text provided by the council. The proposed plan and proposals map should be altered accordingly. In reaching this conclusion, I have taken into account the comments from NHS Fife. Discussions with NHS Fife regarding possible impact on healthcare services would no doubt be beneficial. However, such discussions can take place irrespective of whether they are mentioned in the plan and the proposed plan need not refer to such discussions.

109. I note from submissions that the envisaged development appears to take in other nearby land. The representation refers only to sites KCD 002 and KCD 003 and so my remit is restricted to these two sites.
Kincardine - Multi-storey Flats, site KCD 004

110. The proposed plan says that site KCD 004 has planning permission and is under construction. From my site inspection, I note that site KCD 004 to the west of Sandeman Court is already developed.

111. The concern in the representation is possible harm to woodland that adjoins the north and north-east sides of the site. I do not accept that the housing land allocated under KCD 004 should be deleted as the development site extends some distance from the edge of the adjacent woodland.

112. In its response to the representation, the council indicates that it would be appropriate to include in the proposed plan text relating to the adjoining woodland. The council has now altered its view. In response to a further information request (FIR 75), the council no longer recommends any change to the proposed plan. This is because planning permission has been granted and is currently being implemented. Condition 13 of the planning permission already seeks to safeguard the trees outwith the application site.

113. In view of the circumstances, I conclude that the proposed plan need not be altered.

Kincardine - Kincardine Power Station site

114. The scope of the representations includes site KCD 006 (Kincardine Power Station 4 East), the adjacent area that is shown on the proposals map as a safeguarded employment area and land on the south-east side of the latter which is shown as protected open space. Requests for further information (FIR 51 and FIR 51(b)) relate to the representations.

115. One representation seeks a presumption that the whole power station site should be allocated for housing after appropriate clean-up, if no suitable energy use can be found within a fixed period. I have not been provided with any environmental information to demonstrate that housing development on the site would be acceptable. Nor do I have any information to show that there has been any public engagement regarding this suggestion. Without this information, I am unable to recommend that the proposed plan be altered in the way suggested. (Paragraph 118 of circular 6/2013: Development Planning refers.)

116. Policy 11: Low Carbon Fife will apply to proposals for development on the Kincardine Power Station site. In view of this, I find that there is no need to restrict development on the site to low-carbon technologies.

117. One representation seeks improved public access to the north east of the site to enable access to the waterfront. It says that improvement to the waterfront access should be a commitment.

118. I note that, for site KCD 006, the proposed plan says the council will work with the landowner to consider future redevelopment options. The plan also refers to assessments of the full site of the power station. "The outcome of these assessments will be considered for inclusion in a future review of this Local Development Plan."
119. From my inspection, I see that the Fife Coastal path runs along the south-west side of the site. The path, which is also signposted as a cycle route, is squeezed in between a site security fence and the shoreline. Beyond, to the north-west, the path goes beneath the Clackmannanshire Bridge and, for a short distance before reaching Hawkhill Road, it goes beside the main road carriageway.

120. I find that a link between the coastal path and Hawkhill Road going through the north-west part of the power station site is likely to be more pleasant and convenient than the existing route on the other side of the main road. The amenity of the waterfront section of the path could be considerably improved if a landscaped strip were provided along the south-west side of the site as part of any redevelopment scheme. In view of these considerations, I find that the points raised in the representation have merit. They should be added to the text that refers to assessment of the whole power station site. The plan should be altered accordingly.

121. In its representation, ScottishPower says that it owns the site at the former Kincardine Power Station. This site includes land that is designated in the proposed plan as protected open space. The site also includes some land outwith the three designations shown on the proposals map (protected open space, safeguarded employment area and employment). The whole site should be safeguarded for employment purposes.

122. I note that the land designated as protected open space is no longer in use as a playing field and that an alternative facility has been provided elsewhere in the village. This accords with policy contained in paragraph 226 of Scottish Planning Policy. The council agrees that the open space designation should be removed. My conclusion is that the protected open space designation is no longer appropriate and should be deleted.

123. To facilitate redevelopment for employment purposes, the whole site should be suitably designated, as shown on the plan accompanying the council’s e-mail dated 10 March 2016 which is the council’s response to further information request FIR 51(b). The proposed plan should be altered accordingly.

124. Regarding representation 2828, I find that some additional wording highlighting the Firth of Forth special protection area would be helpful and would be consistent with other parts of the proposed plan. The plan should be altered accordingly.

Kincardine - North Approach Road, site KCD 011

125. Site KCD 011 is occupied by a boarded-up care home. The site is adjacent to the Walker Street car park, which is advertised as having 67 spaces. On the opposite side of North Approach Road and about 30 metres from the site is the nearest part of an area that is designated as “local shopping” and which contains Kincardine’s shopping centre. A short distance north-east of the site there is a light-controlled pedestrian crossing on North Approach Road. This facilitates pedestrian movement between site KCD 011 (and the adjacent car park) and the town centre.

126. From my inspection, I note that the shopping centre is relatively small. There are two food shops. Two or three small shop units are empty. I did not observe, and my attention has not been drawn to, any site in the shopping centre that might be available for new retail or commercial development.
127. I appreciate the concern expressed in the representation. Shopping centres are subject to a variety of adverse influences and Kincardine shopping centre appears to be no exception in view of the loss of retail units described in the representation.

128. Scottish Planning Policy says that the planning system should apply a “town centre first” policy when planning for uses which attract significant numbers of people. Site KCD 011 is not in the town centre, but it is edge-of-centre, which is the next-best option.

129. I note that the proposed plan contains three sites for new housing at Kincardine. In addition, I am recommending that two additional housing sites be included in the plan. There is thus a prospect that the population of Kincardine will increase. This could increase the demand for local shops or other commercial uses.

130. Although site KCD 011 is “edge of centre”, it is only a short distance from the existing shopping centre. A new shop on the site would give local shoppers a greater choice. This, or possible commercial development, could encourage more people to use the shopping centre as a whole.

131. Taking all considerations into account, my conclusion is that the proposed plan should not be altered.

Kincardine - Kirk Brae, site KCD 015

132. Representation 986 contends that the proposed extension to the conservation area is illogical given that the south side of Kirk Brae is not included. From my inspection, it appears that the excluded houses on the south side of Kirk Brae are all relatively modern. Garden ground attached to them is not especially generous in size. There appears to be no scope to erect new development of significant size on any of the garden ground. I am therefore not convinced that the appearance or character of the conservation area is under threat from further development on the south side of Kirk Brae.

133. I note that the proposed extension of the conservation area is based on detailed considerations in the Kincardine Outstanding Conservation Area Appraisal and Conservation Area Management Plan (November 2009).

134. My conclusion is that the proposed plan need not be altered.

135. For the avoidance of doubt, it may be worth making clear that text under KCD 015 in the proposed plan refers to the “proposed” extension of the conservation area boundary. This reflects the fact that conservation areas are designated by procedure prescribed in the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997. They are not designated as part of the local development plan process.

Rosyth issues- sites ROS 005 (Rosyth Europark 3), ROS 006 (Rosyth Waterfront 1), ROS 007 (Rosyth Europark 1), ROS 008 (Rosyth Europark 2), ROS 009 (Rosyth Waterfront 2), ROS 010 (Rosyth Waterfront 2), and ROS 012 (Rosyth Waterfront 4)

136. The representation from Scarborough Muir Group (1025) relates to its 64-hectare Rosyth Waterfront site. The representation site includes six sites that the proposed plan allocates for employment. These are ROS 005, ROS 006, ROS 007, ROS 008,
ROS 009 and ROS 010. The representation site also includes ROS 012. This is allocated for “leisure/community facility”, to provide “opportunity to develop a Gateway to Scotland and other tourist and community related developments”. Retail development is to be tourist-related. Parts of the representation site are designated as protected open space and safeguarded employment areas. Some of the representation site is unallocated land inside the settlement boundary.

137. Representations relating specifically to site ROS 009 and site ROS 012 are addressed under separate headings in the following sections. Representation 1640, although summarised by the council under the heading “ROS 003 Cochrane’s Hotel”, is in fact directed to Rosyth waterfront. It supports mixed-use development at the waterfront. It contends that the waterfront should be an area that local people and tourists could visit, with leisure and tourist attractions and stunning views of the bridges. Representation 1640 is taken into account in this section of the report.

138. The Scarborough Muir Group representation says that the entire 64-hectare site should be identified as a major mixed-use redevelopment opportunity. A master plan or development framework should be prepared for approval as supplementary guidance. The representation includes an indicative master plan, in which five main elements are identified: (i) existing and proposed employment areas forming a continuous business park around the current commercial waterfront area; (ii) the Rosyth gateway, a commercial zone located at the eastern edge of the site; (iii) a mixed-use waterfront destination, combining shops, cafés, bars, offices, galleries and residential; (iv) a Hillside residential neighbourhood; and (v) waterfront gardens and landscape. Of the envisaged total floorspace, by my calculation employment uses would occupy 54%, commercial leisure and retail uses 7%, tourism, community and visitor uses 24% and residential uses 14%. The residential would consist of around 200 dwellings.

139. Among other things, the representation says that its case is supported by the planning history of the site, national planning policy and strategic development plan policy.

140. I note the planning history that is described in section 3 of the Statement of Objection. I find that the most relevant aspects of the history are the 1996 planning permission and the 2013 certificate of appropriate alternative development.

141. The 1996 planning permission for a mix of uses related to a site that covered 143 hectares (Statement of Objection, paragraph 3.9). This is a far larger site than the present representation site. It is not clear to me that the benefits of a permission that relate to a much larger site may be conferred on a different, smaller site.

142. The council says that the planning permission has lapsed. The representor says that the permission has not lapsed. I note that there has been legal argument in the past regarding currency of the permission. I do not have sufficient information to come to a view on this point, nor is it necessary for me to do so.

143. In my view, the relevance of the planning permission to the present examination is primarily the question that it raises: is the range of uses approved in 1996 an appropriate range of uses for the representation site in the present planning context? In answering this question, I find that, since 1996, the planning context has changed. The structure plan system of 1996 has been replaced by the arrangements for strategic development plans. Scottish Planning Policy and the national planning framework have
been introduced. In my view, the provisions contained in these three parts of today’s planning system carry much more weight than the terms of the 1996 planning permission.

144. In the 2013 certificate of appropriate alternative development, the relevant date is 13 November 2009. The narrative in the certificate indicates that the planning context in 2009 was markedly different from that represented by the current adopted local development plan. As indicated by the address given in the certificate and confirmed in paragraph 3.25 of the Statement of Objection, the certificate relates to part only of the present representation site. For these reasons, I find that the 2013 certificate of appropriate alternative development is of limited significance in relation to the matters raised in the representation.

145. Scotland’s Third National Planning Framework was published in June 2014. Paragraph 5.27 refers to Scotland’s maritime freight-handling capacity services. Most movement comes from the North Sea. There is a need to ensure that infrastructure is in place to support key international connections. “Freight Handling Capacity on the Forth” is designated as a national development. In connection with this, there is reference to new freight handling facilities at Rosyth.

146. Annex A in Scotland’s Third National Planning Framework does not contain a map to define a specific site or sites for “Freight Handling Capacity on the Forth”. The location is described as “Existing and disused ports and harbours on the Forth Estuary and transport access to them.” The proposed local development plan (page 155) says that site ROS 013 will be used as a port container terminal for additional freight capacity consistent with Scotland’s Third National Planning Framework.

147. From the foregoing, I find that the requirements of Scotland’s Third National Planning Framework in relation to “Freight Handling Capacity on the Forth” are largely met, so far as Rosyth is concerned, by site ROS 013. This being so, the mixed-use development sought in the representation would not necessarily be in conflict with the Framework.

148. From page 29 of Scotland’s Third National Planning Framework, I note that, in relation to the National Renewables Investment Plan, Rosyth is shown as one of a number of “further potential sites”. In its response to a request for further information (FIR 60), the council says that Rosyth is identified as a medium-term NRIP site. I have no details of the significance of any of this and do not attach weight to it in considering the representation.

149. What Scotland’s Third National Planning Framework does do is highlight Rosyth’s importance as a port. In addition to featuring in “Freight Handling Capacity on the Forth”, Rosyth is part of the Fife Energy Corridor (page 14 of the Framework). This is shown on page 11 of the proposed local development plan. I find that these considerations lend considerable weight to the case for ensuring that land is reserved at Rosyth for transport, industrial and business uses that may require or may be attracted to a location that is close to port facilities.

150. The representation contains quotations from Scottish Planning Policy. I note that Scottish Planning Policy sets out seven core values (paragraph 4). These include playing a key role in facilitating sustainable economic growth, particularly the creation of new jobs and the strengthening of economic capacity and resilience within communities.
Policy principles include giving due weight to net economic benefit and responding to economic issues, challenges and opportunities (paragraph 29). Local development plans should locate development which generates significant freight movements, such as manufacturing, processing, distribution and warehousing, on sites accessible to suitable railheads or harbours or the strategic road network (paragraph 104).

151. I find that the representation site is accessible to harbour facilities. These facilities will be greatly enhanced by proposals for the Rosyth international container terminal (ROS 013). The representation site will have an excellent connection to the strategic road network when the Queensferry Crossing and its associated approach roads are complete. Although unused at present, a railway line traverses the site. From these considerations, I find that the site has the characteristics described in paragraph 104 of Scottish Planning Policy and that it is appropriate that the allocations in the proposed plan are primarily for business, industrial and storage-distribution uses.

152. The representation quotes paragraph 69 of SESplan. I agree that this seeks to safeguard land needed for the international container terminal. It does not preclude allocation of additional land. If there is potential for port-related activities to be located on the representation site, as I believe there is, paragraph 69 seems to suggest that the site should be safeguarded accordingly. In any event, I find no conflict between SESplan and the allocations in the proposed local development plan.

153. I note that Policy 2 of SESplan says that development of mixed communities on strategic employment sites may be appropriate. This clearly does not endorse such development in all instances. For reasons given below, I find that a mixed-use development of the kind put forward in the representation would not be appropriate on the representation site.

154. A mixed-use development of the kind described in the representation would seriously reduce the amount of land available for business, industrial and storage-distribution. My attention has not been drawn to any other site where alternative provision for these particular uses might be made. It may be that Fife has no other site so well-located for such uses as the land at Rosyth.

155. It is contended that there is more than enough effective or established employment land in Rosyth and in Fife as a whole. Even if this is so, it does not necessarily justify reducing the amount of employment land in the representation site. If the employment land supply were in need of reduction, I would expect there to be an assessment of the merits of the “surplus” sites and elimination of those sites with least merit. It seems to me highly unlikely that the representation site would be in the least-merit category.

156. The mixed uses envisaged in the indicative master plan include uses that are best located away from activities that might cause noise, affect air quality or generate heavy traffic. I am not convinced that proximity to an extensive area of port-related activities would be a suitable location for such uses, especially residential, even with uses located as suggested in the revised master plan.

157. Sensitive uses such as residential, if located within parts of the representation site, could lead to complaints from residents or other occupiers about industrial or transport activities on sites in the vicinity. This would not be in the interests of existing businesses and could discourage the attraction of new businesses.
158. It is contended that the various policy designations and different proposals for the representation site are confusing and lack clarity, coordination and consistency. I find the development requirements for each site are clearly described and capable of being readily understood. They are consistent with an intention to meet existing and future business needs in this location. Regarding coordination, I note that the council, in its original response and in its response to the request for further information (FIR 60), says that a development framework is being prepared. This would appear to be a means of securing any necessary coordination.

159. In its response to the request for further information (FIR 60), the representor points out that, during a period of fifteen years, a very large cost has been incurred in preparing the site for new development. The site has also benefited from major infrastructure improvements, including new roads, junctions, drainage and services. It is also pointed out that the site has been largely vacant and derelict for twenty years and that the rate at which employment land in Rosyth has been taken up means that there is an oversupply of such land.

160. In connection with this last point, I note the following. A lot of site remediation work has been carried out. Demolition of the former oil storage bunker is nearing completion and will be fully demolished within twelve months, leaving a cleared and remediated site, available for development. Infrastructure improvements are in place. The Queensferry Crossing is due to open within the next year. It will provide enhanced access to the national road network. An international container terminal is to be developed at Rosyth. All of these elements are likely to result in the representation site becoming much more attractive as a location for business and industrial development.

161. With respect to representation 1640, I note from it and from the Scarborough Muir Group representation that there is local support for mixed-use development on site ROS 009. This is an important consideration, but in the present instance I find that other factors carry much greater weight.

162. The Scarborough Muir Group representation refers to council committee meetings and decisions. Internal council procedures are not within the scope of this examination.

163. In summary, I find that Rosyth has an important national role as a port. There is justification for reserving land within the representation site for transport, industrial and business uses. These uses are ones that may require or may be attracted to a location that is close to port facilities. This is reinforced by imminent excellent connection to the strategic road network, the possibility of a rail freight facility and the prospect of a new international container terminal. The introduction of mixed uses as envisaged in the indicative master plan would seriously reduce the capacity of the representation site to accommodate business uses, would make the site less attractive to such uses and could conflict with business operations on other land in the vicinity.

164. Regarding housing land supply, I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the five-year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under Issue 2(b) Homes with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that use of part of the representation site for residential development would nevertheless be unacceptable because the disadvantages and adverse effects identified above would outweigh the benefits of addressing any shortfall.
165. I conclude that the proposed plan need not be altered.

**Rosyth issues - healthcare services**

166. The representation from NHS Fife refers to additional houses in the Rosyth area. Discussions with NHS Fife regarding possible impact on healthcare services would no doubt be beneficial. However, such discussions can take place irrespective of whether they are mentioned in the plan. My conclusion is that the proposed plan need not be altered.

**Rosyth - Rosyth Waterfront 2, site ROS 009**

167. There is concern over ongoing disturbance to birds associated with the Firth of Forth special protection area. I note that development requirements for site ROS 009 say that proposals must demonstrate that they would not adversely affect the special protection area. I find that this adequately addresses the concern. The proposed plan need not be altered.

**Rosyth - Rosyth Waterfront 4, site ROS 012**

168. I note that the description for site ROS 012 on page 155 of the proposed plan is “Leisure/Community Other Proposal”. On the proposals map (Rosyth inset), site ROS 012 is designated as “Leisure/Community Facility”. The site does not have the cross-hatching that is used to denote “Other Proposal”.

169. The notation for the proposals map has no separate category for tourism. I find it reasonable for tourism development to be included in the “leisure/community facility” category. It is not clear to me why the description in the proposed plan includes “Other Proposal” when the proposals map inset does not have the related cross-hatching notation on ROS 012 and the proposed plan’s development requirements for ROS 012 give some emphasis to tourist-related development.

170. I conclude that there is some possible confusion. This may be avoided by deleting “Other Proposal” and putting instead “Tourist-related Development”. The proposed plan should be altered accordingly.

**Rosyth - Hillwood Terrace, candidate site LDP-ROS007**

171. The representation seeks a housing allocation with an estimated capacity of eight dwellings. The representation challenges aspects of the site assessment.

172. From my site inspection, I find that a limited amount of development on the site could integrate with the existing built-up area. The adjacent houses on Castlandhill Road are set back some 12 metres or more from the edge of the carriageway. It may well be that development on the representation site would require a similar set-back if it is to integrate satisfactorily with the adjoining houses.

173. The northern part of the site is narrow. On its east side it has an outlook to the high mound that is part of the current road works associated with the Queensferry Crossing. On the west side it has an outlook to the rear gardens and rear elevations of houses on Castlandhill Road and Hillwood Terrace. It seems to me that the scope for development on this part of the site is extremely limited.
174. Local services are not as close as is desirable, but are barely any further away than they are from the eastern extremity of site ROS 016, a site which the council proposes for housing development.

175. The representor expresses a willingness to provide public green space within the site. I find that this is not a determining issue in this case in view of the relatively small size of the site and limitations on the amount of development that it might be able to contain.

176. From the foregoing, I find that it is unlikely that the site could satisfactorily accommodate as many as eight dwellings. I find that the site might be capable of accommodating a smaller number of dwellings - probably less than five. From my reading of the proposed plan, I note that housing allocations are identified for sites that have an estimated capacity for five or more dwellings, but not for sites of less capacity than this.

177. A drawing accompanying representation 1491 shows how vehicular access to the site might be achieved. The access shown on the drawing is almost directly opposite one of the possible principal access points for housing site ROS 016 (see the last page of the supporting document submitted with representation 1844). I am not convinced that this would be a satisfactory arrangement, especially as Castlandhill Road appears to function as a distributor road.

178. My conclusions are that the site should not be identified for housing and that the proposed plan should not be altered.

Rosyth - Hilton, candidate site LDP-ROS002b

179. Candidate site LDP-ROS002b is in agricultural use. Representation 1766 seeks an allocation that would permit high-quality class 4 employment development. The representation refers to national and strategic plan policies that support sustainable economic growth and that require plans to allocate a range of sites for business. I note that SESplan (paragraph 69) says that the potential for port-related activities at Rosyth to expand is to be safeguarded in the local development plan.

180. In the proposed plan, much of the land identified for new class 4 business use is located in the south-east of the Rosyth settlement area where there is good accessibility to the A90-M90 corridor. Much of the identified land is also brownfield. Reuse of brownfield land is supported by SESplan (paragraph 17) and by Scottish Planning Policy (paragraph 40).

181. In the south-east part of Rosyth, there are five sites which are allocated for class 4 business use (and other uses). The sites have a total area of some 35.1 hectares. In addition, two parcels of land identified as a single proposal (ROS 011 - Admiralty Park), with an area of 6.9 hectares, are allocated for class 4 business use and other uses at a location that is a relatively short distance (about one kilometre) east of candidate site LDP-ROS002b.

182. The extract from Fife Employment Land Audit submitted with the representation shows that the amount of employment land in Rosyth is sufficient to meet the town’s needs. The site assessment says that employment use on candidate site LDP-ROS002b would comply with the strategy of identifying appropriate employment
183. I note the terms of the Accessibility Statement that forms part of the representation. I find it likely that most journeys to and from the proposed development would be by car. From my inspection of the Rosyth area, I find that the most accessible part of the town is on its south-east side, with its proximity to the A90-M90 and the railway network.

184. The south-east part of candidate site LDP-ROS002b adjoins a small portion of the international container terminal site. Apart from this, the site is separated from the defined Rosyth settlement by agricultural land. The indicative development framework in the representation shows landscaping both within the site and along its edges.

185. I note that the site assessment says there is prime quality land on the site.

186. My findings are as follows.

187. The proposed plan contains an adequate amount of land for class 4 business use in the Rosyth area.

188. In the proposed plan, much of the land identified for new class 4 business use is located in the south-east of the Rosyth settlement area where there is good accessibility to the A90-M90 corridor. Much of the identified land is also brownfield. Reuse of brownfield land is supported by SESplan (paragraph 17) and by Scottish Planning Policy (paragraph 40).

189. I agree that, in general terms, use of the site for employment would comply with the strategy of identifying appropriate employment land near ports. However, this does not justify employment designation of every undeveloped site in or around Rosyth. In the present instance, it has not been demonstrated that there is any lack of sites in Rosyth for the kind of development envisaged in the representation. I find that development proposed in the representation would be inconsistent with the local strategy for provision of employment land in Rosyth, with its emphasis on the most accessible sites and reuse of brownfield land.

190. Notwithstanding the amount of landscaping envisaged in the representation, development on the site would relate poorly to the built-up area of Rosyth. Development on the site would in effect extend the Rosyth settlement boundary 400 metres to 500 metres further west, taking in a much larger area of land than the site itself. Development would be largely separated from the rest of the built-up area by the large field to the east of the site.

191. Scottish Planning Policy (paragraph 80) says that development on prime agricultural land should not be permitted except in certain circumstances. None of the circumstances applies in the present case.

192. From these findings, and having taken into account all the other points made in the representation, I conclude that candidate site LDP-ROS002b should not be allocated for class 4 employment development. The proposed plan need not be altered.
Rosyth - Hilton, candidate site LDP-ROS002a

193. Representation 1774 opposes the non-allocation of candidate site LDP-ROS002(a) for residential uses. The representation says that the site has an area of about 16.1 hectares. It could accommodate approximately 400 homes. It represents an excellent opportunity to deliver a high-quality residential development that will contribute to meeting the SESPlan additional housing requirement and address the ongoing and significant housing land supply failure in this part of Fife. The site is within 1600 metres of local facilities and is well-located in relation to schools, shops and public transport.

194. In the site assessment form, the council contends that the site is not well-related to Rosyth and existing facilities. Housing on the site would have no integration with other residential areas. The council says that development would have significant landscape impacts. The site sits prominently on south-facing slopes on the end of an east-west ridgeline and is within a local landscape area. Development would require off-site transport interventions. There are emerging air quality issues in Admiralty Road. The site lies in the consultation zone of the major hazard site relating to Rosyth Royal Dockyard.

195. I note that the north boundary of the site adjoins part of A985, beyond which is open countryside. A985 is a trunk road. It connects the A90/M90 at Rosyth to the Kincardine Bridge. To the west of the site is further open countryside, including candidate site LDP-ROS002b. South of the west part of the site is a large agricultural field. South of the main part of the site are HMS Caledonia and an open-air Ministry of Defence recreation ground. East of the site is part of Admiralty Park (site ROS 011), an employment area that is not yet fully developed and which has tree belts on its north, west and south sides.

196. I note that there are two residential areas within 300 metres of the site. Housing in the Dundonald Road and Peasehill area is potentially accessible from the site by means of a short section of the Fife coastal path route, which caters for people on foot and cyclists. Housing and local shopping on the east of Brankholm Brae is separated from the site by the A985. The housing development is only partially complete. The local shopping consists of a Sainsbury’s Local and four smaller shop units which are not yet occupied.

197. The three nearest schools are one kilometre or more from the site. Journeys to two of them require crossing the A985. Apart from the shopping on Brankholm Brae, the nearest shops appear to be on Queensferry Road, at a distance of about 1600 metres.

198. Within two kilometres of the site is a zone that stretches from the Rosyth international container terminal site, through HMS Caledonia and the Rosyth Europarc to Rosyth Waterfront. This zone, when fully developed, will provide a considerable range of employment opportunities.

199. From the preceding considerations, I find that residential development on the site would be poorly-related to Rosyth as a whole. It would not adjoin any other residential area. The one part of the existing built-up area that it does adjoin is HMS Caledonia, which is bounded by security fencing. Development on the adjoining part of Admiralty Park would be contained by tree belts. The shopping on Brankholm Brae is reasonably near, but reaching it involves crossing A985. Most of the town shopping is much further
away. Primary schools are not conveniently accessible. The proximity of employment opportunities does not outweigh these disadvantages.

200. I note that the site assessment says that the site is within the designated local landscape area. From my reading of the current adopted local plan, I find that this is not the case. The local landscape area designation applies to land on the north side of A985. The representation site is on the south side of this road. The proposed plan makes no change to the extent of the local landscape area.

201. Policy 13 in the proposed plan aims to protect or enhance local landscape areas. Where impact is unavoidable, satisfactory mitigation is required.

202. The site is located on relatively high ground astride a ridge. The northern half of the site slopes down towards the A985. Beyond the road, the land slopes down more steeply to Brankholm Burn. Much of the site thus overlooks the Pattiesmuir to Brankholm Brae section of the designated local landscape area. To the south of the site there is a more gradual downward slope, largely occupied by built development associated with what is now Port Babcock Rosyth.

203. I note that buildings within the HMS Caledonia site are visible as skyline features from the local landscape area and that the dockyard travelling crane is a prominent feature. I also note that development as proposed in the representation includes woodland copses along the A985.

204. I find that the residential development proposed in the representation would have an impact on the local landscape area in that, notwithstanding provision of copses, it would be prominently visible on the skyline as seen from the Pattiesmuir to Brankholm Brae section of the designated area. This section of the designated area is traversed by a core path. The proposed development would also be readily seen by southbound travellers on Brankholm Brae. Development on the site would have a considerable east-to-west extent and would have a much greater impact than that of HMS Caledonia and the crane. My conclusion is that the proposed development would not accord with Policy 13.

205. The site assessment says that a transport assessment is required. In its response to the representation, the council says off-site transportation interventions would be required. The council does not specify what these interventions might be. The representation says a transportation assessment would and can only be produced as part of detailed development proposals as the site moves forward through the planning process. The representation includes an accessibility statement.

206. I see no reason why a transport assessment could not have been produced at the present time. An estimate has been made of the number of dwellings that might be erected on the site. An indicative development framework has been prepared. This could have been progressed to an indicative layout if more detail were needed as an input to a transportation assessment. Without a transport assessment, it is not possible to judge the effect of the proposed development on the surrounding transport network, in particular the A985, which is a trunk road and which may have air quality issues.

207. From the site assessment, I note that there is prime quality land on the site. Scottish Planning Policy, paragraph 80, says that development on prime agricultural land should not be permitted except in certain circumstances. I find that these circumstances
do not apply in the present instance. The proposed development would therefore not accord with this aspect of Scottish Planning Policy.

208. I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the five-year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under issue 2(b) Homes with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that this site would nevertheless be unacceptable because the disadvantages and adverse impacts identified above would outweigh the benefits of addressing any shortfall.

209. Regarding the major hazard site at Rosyth Royal Dockyard, this does not appear to have prevented recent residential development on land that is to the south-east of the representation site and that is somewhat closer to the dockyard. In the absence of more tangible evidence of any need to restrict development, I do not attach weight to this aspect of the council’s response.

210. My conclusion is that the proposed plan need not be altered.

Rosyth - Rosyth Park, part of candidate site LDP-ROS001

211. The subject of representation 1777 is a site of 1.7 hectares. It is immediately east of site ROS 014, Rosyth Rail Halt Park and Choose. Both sites are within the much larger (21.5 hectares) candidate site LDP-ROS001. The representation seeks allocation of the 1.7 hectares site for Class 4 business use.

212. I acknowledge that economic development is given strong support in the third National Planning Framework and in Scottish Planning Policy. I find that this support is evident in the proposed plan, which, among other things, designates considerable areas of land in Rosyth and Dunfermline as safeguarded employment areas and as sites for employment development proposals. This accords with SESplan, which identifies the Dunfermline and Rosyth area as an economic cluster (page 34) and which seeks provision of a range and choice of marketable sites to meet anticipated requirements (page 35).

213. The representation makes reference to availability of employment land. If the 1.7 hectares site were allocated for business use, I am not convinced that it would be available for development. This is because the site lacks satisfactory access.

214. The representation (paragraph 6.7) puts forward an arrangement whereby access to the 1.8 hectare site would be taken through the park-and-choose site. This has been agreed in principle by a council transport officer. This agreement is subject to a transport assessment being carried out. Thus this access arrangement depends both on implementation of the park-and-choose facility and on a satisfactory outcome from the transport assessment. It has not been demonstrated to me that funding is available for the park-and-choose facility and that there is a commitment to its construction.

215. The representation (paragraph 6.20) says that access to the 1.8 hectare site can be taken from Castle Brae to the north. A new flyover bridge would be constructed over the A823(M). This would allow direct access into the site with no impact on the proposed park-and-choose facility. This form of access has been agreed in principle by the council’s transportation officers.
216. I note that the representation contains no estimate of the cost of a bridge over the A823(M). There is no indication that an exercise has been undertaken to demonstrate that business development on the representation site, if dependent on the new bridge, would be a practical proposition in financial terms.

217. The representation (paragraph 6.16) refers to an approach to the council made by a third party who specialises in raising funds for major infrastructure schemes where promoters of the schemes lack the necessary finance. The third party would deliver the park-and-choose facility in partnership with the representor on a “not for profit” basis. The proposed business development on the representation site would assist procurement of the park-and-choose facility.

218. I have no information as to whether procurement of the park-and-choose facility involving the third party would be acceptable to the council and no information as to how long it would take to bring the facility into use by this means.

219. From all the foregoing, I find that it has not been demonstrated that business development on the representation site is deliverable in the short term and that allocation of the site would augment the supply of immediately-available employment land in the Rosyth and Dunfermline areas. I am not convinced that the proposed business development would meet any need for immediately-available employment land.

220. Nor am I convinced that there is a need for additional land for business development in view of the extent of both the designated safeguarded employment areas and the sites for employment development mentioned above. In the absence of need for additional land for business development, allocation of the representation site could have an adverse impact on the effectiveness of sites, particularly brownfield sites, that are identified for business use in the proposed plan.

221. Scottish Planning Policy (paragraph 40) promotes a sustainable pattern of development. Related policy principles include considering the re-use or re-development of brownfield land before new development takes place on greenfield sites. The representation site is greenfield. Much of the land that is identified in the proposed plan for employment use in the Dunfermline and Rosyth area is brownfield. I find that, in the absence of demonstrated need for additional employment land, allocation of the representation site would not accord with paragraph 40 of Scottish Planning Policy.

222. Candidate site LDP-ROS001 forms an open, undeveloped area between Rosyth and Dunfermline. It has an important role in preventing coalescence of these two communities. The proposed park-and-choose facility development would involve little in the way of buildings. With landscaping, its impact on the role of the candidate site would be limited. By contrast, erection of business-use buildings on the representation site would be likely to have a considerable landscape impact. They would be on a central, more prominent part of the candidate site. They would have an isolated appearance, with open ground to the west, south and east and the motorway to the north. They would be poorly-related to existing and proposed built development.

223. My conclusion is that the representation site should not be allocated for business use. The proposed plan need not be altered.
Rosyth - Brankholm Lane, site ROS 002

224. I note that, in the proposed plan, “Brankholm” is misspelt. This can be corrected by the council as a minor error without formal modification.

Rosyth - Cochrane’s Hotel, site ROS 003

225. In the proposed plan, the proposals map shows that site ROS 003, Cochrane’s Hotel, is located between Hilton Road and Castle Road. It is described as a housing opportunity site. Representation 1640 refers to Rosyth waterfront. In response to a request for further information (FIR 64), the council explained that there had been a change in site numbering and that the council’s response to representation 1640 was made on the basis that the representation referred to Rosyth waterfront.

226. Representation 1640 is therefore taken into account in the earlier section under the heading “Rosyth - sites ROS 005 (Rosyth Europark 3), ROS 006 (Rosyth Waterfront 1), ROS 007 (Rosyth Europark 1), ROS 008 (Rosyth Europark 2), ROS 009 (Rosyth Waterfront 2), ROS 010 (Rosyth Waterfront 2), and ROS 012 (Rosyth Waterfront 4)”.

Rosyth - Primrose Lane 2, site ROS 004

227. Representation 1914 points out that the description of site ROS 004 is “employment” and that the proposed plan also gives an estimated housing capacity. I note that, in addition, the proposed plan requires affordable housing and the site is designated for housing on the proposals map. The site is also included in the 2015 Housing Land Audit. From all this, I find that the description of the site contained in the proposed plan is an error. In the circumstances, this can be corrected by the council as a minor error without formal modification.

228. From my inspection, I note that most of the site is rough grassland and appears to be disused. The one exception to this is a rectangular area opposite the houses at 31 to 47 Whinnyburn Place. This area has mown grass and is used as a public open space.

229. In the existing adopted local plan, the site is allocated for housing.

230. The representation says that site ROS 004 should be retained for employment uses. I find that this would be a change from what is proposed in the present plan. I note that the site adjoins Primrose Lane Industrial Estate. Access to the site from the two roads serving the industrial estate is readily available and the site itself is flat. This suggests that, at first glance, the site might be suitable for employment use.

231. I am not aware of any special demand for employment land at this location or of a shortage of employment land in this part of the Rosyth area. It has not been demonstrated that there has been any change in circumstances since the 2012 local plan examination, when the housing allocation was endorsed. There is a need for an adequate supply of housing land, as considered under Issue 2b Homes. From all these considerations, I find that the proposed housing allocation is, in principle, acceptable.

232. Concern about what was described as a valued informal recreation area was given consideration at the 2012 local plan examination. The concern in the present
representation is that this area will be lost. I note that, in the proposed plan, Policy 3: Infrastructure and Services and Policy 10: Amenity contain provisions that seek to protect open space provision. Policy 10 says that development proposals must demonstrate that they will not lead to a significant detrimental impact on amenity in relation to loss of open space. I find that this provides the basis for taking into account need to retain the open space opposite 31 to 47 Whinnyburn Place and adequately addresses the concern about loss of open space.

233. My conclusion is that the proposed plan need not be altered.

Rosyth - Rosyth International Container Terminal, site ROS 013

234. Representation 3275 seeks reference to the need for a flood risk assessment in the text associated with site ROS 013. The council raises no objection to this request. I note that the site is adjacent to the coastline. Scottish Planning Policy (paragraph 256) says that the planning system should prevent development which would have a significant probability of being affected by flooding or which would increase the probability of flooding elsewhere. Reduction of functional floodplains should be avoided. Development on the proposed allocation site must conform to these requirements. To ensure this, a flood risk assessment should be carried out. Thereafter, design of development for the site should take into account the findings of the flood risk assessment. The proposed plan should be altered accordingly.

Rosyth - Rosyth Rail Halt Park and Choose, site ROS 014

235. The council’s summary under the heading for site ROS 014, Rosyth Rail Halt Park and Choose, refers to two representations. I find that one of these, representation 3587, does not refer to site ROS 014 and so is not considered here.

236. In the proposed plan, text under site ROS 014 requires a buffer strip and a feasibility study. Representation 3592 supports these requirements. Representation 3592 does not seek a requirement for a flood risk assessment. I find that there is no conflict between the proposed plan and the representation. There is thus no need for me to consider whether the plan should be altered.

Rosyth - Land at Admiralty Road & East of Brankholm, site ROS 015

237. In the proposed plan, text under site ROS 015 requires a buffer strip and a feasibility study. Representation 3594 supports these requirements. Representation 3594 does not seek a requirement for a flood risk assessment. I find that there is no conflict between the proposed plan and the representation. There is thus no need for me to consider whether the plan should be altered.

Rosyth - Castlandhill (North), site ROS 016

238. In the proposed plan, one of the development requirements for site ROS 016 is a transport assessment. I would expect this to identify safe and convenient means of access to and from the site as well as any need for off-site works to ensure no unacceptably detrimental effect on the surrounding transport network. I find nothing in the representations that demonstrates that satisfactory access arrangements are unlikely to be possible.
239. From my inspection of the site and its surroundings, I can understand concerns about drainage. I noted a number of places in the adjacent residential area to the north where sandbags had been placed to deflect surface water run-off and where silt had been washed down from site ROS 016.

240. In the proposed plan, one of the development requirements is a water and drainage impact assessment. The “Green Network Priorities” section refers to overland flow issues. I would therefore expect the water and drainage impact assessment to consider not only drainage within site ROS 016 but also the effect of development on the adjacent residential area. There is clearly a problem with regard to surface water run-off. Development of the site might offer opportunity to alleviate problems being experienced in the adjacent residential area. The impact assessment would have to investigate this problem and seek means by which it could be eliminated.

241. Effect of development on the privacy and daylighting of existing dwellings is one of the concerns in the representations. From my inspection of the site, I noted a number of points relevant to this concern. Site ROS 016 is on rising ground and much of the site is to the south of existing development. The existing development takes a variety of forms in relation to the boundary between it and site ROS 016. In some places there is open space adjacent to the boundary. In other places houses come quite close the boundary. In some places, existing buildings have few windows facing the boundary. Elsewhere, houses appear to have important outlooks towards site ROS 016. In some places, site ROS 016 rises only gradually above the nearest existing development. Elsewhere it rises pronouncedly.

242. From the foregoing, I find that, if site ROS 016 is to be developed, the effect of development on the privacy and daylighting of existing dwellings would have to be given particularly careful consideration. If this were done, it appears to me that site ROS 016 could be developed without unacceptable effects on the daylighting and privacy of existing dwellings. The proposed plan should require that the necessary careful consideration be given.

243. Regarding wider landscape and visual impact, my attention has not been drawn to any particular viewpoints or localities from which the appearance of development on ROS 016 would be especially harmful.

244. Development on site ROS 016 could impact significantly on the southwards outlook from the open space that is south of the primary school and east of Bevan Place. This impact need not be unacceptable if layout and building design are appropriately sensitive to their surroundings.

245. Much of the built-up area to the north of site ROS 016 is on relatively flat ground. Consequently, views of the site from this area are prevented by intervening buildings. One exception to this is in the vicinity of the junction of Admiralty Road and Ridley Drive. From here the upper part of Castland Hill is visible, but development on site ROS 016 would be well below the skyline and probably inconspicuous.

246. From the foregoing considerations, I find that development on site ROS 016 would not necessarily have unacceptable landscape and visual impacts.

247. Development on site ROS 016 would result in loss of agricultural land. Some loss of agricultural land is unavoidable if the housing land supply requirement prescribed in
SESplan is to be provided. The site assessment (reproduced in appendix 3 of the submission accompanying representation 1844) states that the site is not prime quality agricultural land. Taking these points into account, I find that loss of agricultural land is not a reason for rejecting residential development on the site.

248. Site ROS 016 is within the site of the second battle of Inverkeithing. Historic Environment Scotland is not raising objection to development on ROS016. Under Issue 2h, I am recommending that the proposed plan be altered so that development requirements for ROS 016 (and other sites) include reference to the battle site. I find that this adequately addresses concern about the battle site.

249. Developer requirements in the proposed plan include reference to developer contributions to education. This should ensure that any need for additional school places will be met.

250. My overall conclusion is that, in relation to site ROS 016, the proposed plan need not be altered.

Rosyth - Castlandhill (South), site ROS 017

251. Site ROS 017 is on the east side of Whinny Hill. Whinny Hill is a southern outlier of Castlandhill. The whole hill mass is a prominent feature seen ahead and slightly to the left by north-bound travellers on the A90 as they emerge from the cutting in the vicinity of North Queensferry.

252. South-bound travellers on the A90 see the site for a shorter time. For them, the site is seen as being immediately below Whinny Hill. Woodland along the whole of the skyline in the vicinity is a notable feature of the view.

253. The A90 passes within 100 metres of the site. Where it passes the site, the road is above the adjoining ground level, and travellers have a close-range view of the site. This will remain the case when the Queensferry Crossing is completed.

254. During my inspection, noise from traffic on the A90 was constantly audible at a noticeable level. At the time, a temporary 40 mph speed limit was in force.

255. Representors say that building on Castlandhill will compromise the landscape setting of Rosyth. In their opinion, development on Castlandhill would be inappropriate because of its potential impact.

256. The supporting representation says that development would be seen against the backdrop of the hill behind. A well-designed hotel development would retain the ‘green’ aspect of the site and would conform to requirements prescribed in the proposed plan. The representor is wholly committed to the delivery of a high-quality hotel development and tourist destination. It is argued that the form of development has been carefully considered and that the architectural images clearly demonstrate a high-quality development, designed to fit into the hillside and landscape setting.

257. The supporting representation refers to use of the summit of Whinny Hill as a destination point, taking advantage of the high quality natural environment and views that it affords by providing a small monument and possible picnic facility. An interpretation centre for the nearby historic Battle of Inverkeithing would be incorporated.
within the proposed development. There could be a viewing platform for the Forth Rail Bridge at Castlandhill.

258. I find that Castlandhill, including its Whinny Hill outlier, is an important landscape feature. Despite the masts and skyline development at its summit, its predominantly rural character gives it a pleasing appearance. Its value as an attractive landscape feature is emphasised by two facts. First, it is a rural enclave in an area where there is much built development. In this respect, it helps to separate Rosyth and Inverkeithing. Second, it is seen by large numbers of travellers on the nearby trunk road.

259. I am not convinced that development on the scale envisaged in the supporting representation could retain the green aspect of the site. Rather, buildings would radically alter the character of the site. So too would parking areas if it became apparent that the envisaged amount of undercroft parking could not be provided.

260. The supporting representation gives emphasis to high-quality development. I am not convinced that the architectural images demonstrate this. In any event, design will depend very much on the requirements of the site developer or end-user. At present it is not known who the developer or end-user might be.

261. From my inspection, I note that the summit of Whinny Hill is wooded. From the summit, glimpsed views of the Forth are attractive, but trees mean that there is no panoramic view. The existing and under-construction road bridges are seen at fairly acute angles. The Forth Bridge (the railway bridge) is largely concealed by the high ground between the site and North Queensferry. For all these reasons, the site and adjacent Whinny Hill are possibly not the best vantage points from which to appreciate the three crossings of the Forth.

262. Regarding vehicle traffic, the site assessment says that a transport assessment would be required. There is no suggestion that local roads would lack the capacity to accommodate additional vehicle movements. A transport assessment would identify any need for network improvements, for example at the junction of Castlandhill Road and Lothians View.

263. Regarding flooding, from my inspection it appears that the road on the east side of the site is being realigned as part of the works associated with the Queensferry Crossing. It may be that the new section of road will not be susceptible to the flooding that has occurred on the existing road.

264. Site ROS 017 is within the site of the second battle of Inverkeithing as shown in Historic Environment Scotland’s inventory of historic battlefields. Other sites proposed for development are also within the designated battlefield. So far as I am aware, Historic Environment Scotland is not objecting to development on ROS 017 or on the other sites. A representation from Historic Environment Scotland is considered under Issue 2h: The Environment and Flooding. It is clear that the character of the battlefield has been enormously changed by later development. In all the circumstances, I find that the battlefield designation is not a reason for rejecting development on ROS 017.

265. The supporting representation says that the designation contained in the proposed plan represents a unique opportunity to provide a truly iconic development in a key gateway to Fife. It goes on to say that the site is highly visible. The envisaged hotel, conference uses, tourist centre and ancillary uses would create a strategic tourist
destination, attracting visitors from Fife and beyond to the local area. The site benefits from excellent access and transport links.

266. The council envisages that a hotel would boost visitor spend and related economic activity.

267. From my inspection of site ROS 017 and the wider area, I note that there are existing hotel facilities close to the A90-M90 corridor in the Rosyth-Dunfermline area. During the course of the examination, I became aware of the Hotel Development Study - Fife of May 2012, which is supporting document 2 in Issue 16: St Andrews. In a request for further information (FIR 105), the representor and the council were asked about the relevance of the Hotel Development Study. The representor notes that the Study supports the principle of hotel development at Castlandhill. The council says that the Study was not used as the basis for allocating Castlandhill in the proposed plan.

268. I note that the uses envisaged for the nearby site ROS 012, Rosyth Waterfront 4, include a “Gateway to Scotland” and other tourist developments.

269. In its response to a request for further information (FIR 65), the council confirms that site ROS 017 is within the consultation zone for the major hazard site at Rosyth Royal Dockyard. A hotel is a kind of development that is likely to adversely affect the operation of the off-site emergency plan. This does not necessarily mean that the Office for Nuclear Regulation would advise against the development.

270. From the foregoing, I draw the following conclusions.

271. The site is part of a local landscape feature that is attractive, that provides a green enclave in an area with much built development, that separates Rosyth and Inverkeithing and that is seen by a large number of travellers. For these reasons, this landscape feature is of considerable value as a green area.

272. The proposed development would radically alter the character of site ROS 017. This in turn would have a significant effect on the local landscape feature mentioned above. The value of this feature as a green area would be seriously diminished.

273. I am not persuaded that a development could be designed to have such high quality as to outweigh the value of this landscape feature as a green area.

274. Views of the Forth and the bridges are not of such quality as to lend significant support to the case for development. The site is subject to significant noise from traffic on the nearby A90 road.

275. From the Hotel Development Study - Fife it appears that further hotel, conference and tourist development in the Rosyth-Dunfermline area could be provided on other sites. It seems likely that at least some of these other sites would have better access to visitor attractions and be better served by public transport. A town centre location would accord with paragraph 60 of Scottish Planning Policy, which says that, when planning for uses which attract significant numbers of people, a town centre first policy should be applied.

276. An increase in visitor spend and related economic activity could therefore also be achieved by hotel development on other, more appropriate sites in the Rosyth-
Dunfermline area.

277. It may be that the Office for Nuclear Regulation would not advise against the proposed development. The fact that the site is within the major hazard consultation zone is of limited weight in assessing the merits of the case for development on site ROS 017.

278. Other matters raised in representations do not have a material bearing on whether site ROS 017 should be retained in the proposed plan.

279. On balance, I find that the adverse impact on a local landscape feature that is attractive, that is seen by large numbers of people and that separates Rosyth from Inverkeithing and the prospect that other sites could be more accessible by public transport and more accessible to visitor attractions clearly outweigh the economic and other benefits put forward by the council and in the supporting representation. The conclusions clearly weigh against retention of site ROS 017. The site should be deleted from the proposed plan.

Rosyth - Rosyth Bypass, ROS 019

280. The representor supports construction of the Rosyth Bypass but is puzzled by the private sector being described as the lead agency. I note that the Fife Local Development Plan Action Programme October 2014 (page 90) says: “Deliver through development management process. Secure strategic transport interventions through planning permission and legal agreements”. My conclusion is that the proposed plan is correct in stating that the lead agency is the private sector. The plan need not be altered.

Torryburn - site designated as School or Further Education Campus

281. What is being sought in representation 1256 from BP North Sea Infrastructure was not entirely clear to me. I requested further information (FIR 67). The response shows that the representation relates to a policy matter and a related request that pipeline consultation zones be included on the proposals map. These matters are addressed under Issue 2j.

COUNTRYSIDE AREA

Inverkeithing - Cruiks Quarry

282. In the current adopted local plan, Cruiks Quarry is shown on the proposals map as site INV 008. Its designation is “Other Proposal”. The written text says that the quarry has planning permission for the period to 2013 but there may be scope for mineral extraction beyond this date. The emphasis in the remaining text is on use of the site after quarrying has ceased. There is reference to the possibility of a marina and to the need to take account of the Firth of Forth special protection area.

283. In the proposed plan, the quarry is no longer shown as an “Other Proposal” site and has no specific designation.

284. The representation says that a planning application to extend the quarry was approved in 2012. Extraction would continue for a further 20 years. This is a longer
period than that covered by the proposed plan. It is contended that Cruicks Quarry should continue to be identified as a consented quarry. The wharf on site is of strategic economic importance to the quarry operators. Continued use of the wharf should be protected by the proposed plan.

285. In response to a request for further information (FIR 70), the council confirms that planning permission was granted in 2012 for extraction of minerals for a further 20 years. Conditions require site restoration, including an enhanced landscape and water feature for leisure amenity.

286. The council says that the quarry was designated as an “Other Proposal” in the current adopted local plan because planning permission for extraction had been coming to an end and there was no indication of future extraction from the quarry. In the proposed plan, the quarry site is not designated as an “Other Proposal” because there is now an extant permission for extraction of minerals for some 17 years. Any redevelopment of the site post-extraction would occur beyond the proposed plan period. Thus no proposal requires to be identified as no land use change is proposed within the plan period.

287. The council sees no reason for the wharf to be protected by a provision in the proposed plan. The wharf will be used for at least the next 17 years as part of the mineral extraction process.

288. I find nothing in the submissions to demonstrate that lack of a quarry or other designation in the proposed plan is likely to have any adverse effect on the continuation of quarrying operations. This continuation and associated use of the wharf are assured by the planning permission granted in 2012. It is expected that quarrying will continue throughout the plan period.

289. Regarding any suggestion that the proposed plan endorse particular uses of the site once quarrying has ceased, I find that cessation of quarrying is so far in the future that circumstances could change with regard to what after-uses might be appropriate. So far as I am aware, details of post-quarrying uses have not been brought forward and have not been subject to public consultation. In view of the foregoing, I conclude that it would not be appropriate for the proposed plan to endorse any particular post-quarrying use or uses.

290. I recognise that restoration and reuse of Cruiks Quarry should be planned well in advance of the cessation of quarrying. I note that the owners are exploring alternative development options for the site once all mineral has been fully extracted. This is commendable. It could lead to proposals that undergo a consultation process and that might then be identified in a future local development plan.

291. I conclude that the proposed plan need not be altered.

Crombie - candidate site LDP-CRM001

292. According to the site assessment, candidate site LDP-CRM001 has an area of 15 hectares. In representation 1239, not all of the site is proposed for built development. Housing is proposed on 7.6 hectares. The representation says that the housing element is limited to 150 houses. The land would be an effective housing site. It would assist in meeting any housing land deficit in the short-term. On 1.5 hectares at the east end of
the site, there would be a café/restaurant/farm shop/children’s play area. This would take the form of a landmark building. The building would give Crombie a profile, which is important in regeneration, and would provide a screen for much of the new housing when viewed from the east. The facility would serve both local and tourist trade. A care facility would be erected on part of the site (about 0.7 hectare). It is likely that fifty jobs would be created. A large part of the site would be used as open space, including pitches. The proposed development would include provision of a new access between A982 and the Crombie defence munitions centre. A local survey showed that 71% of respondents were in favour of the proposed development.

293. Representation 1293 refers to the decline of Crombie village. It says that the village has lost its church, pub and shop and will soon lose its school. From my inspection, I see that the school has now closed. The representation says that the “reduced scale of housing now proposed is considered that which is necessary to have a meaningful impact to ensure successful regeneration.”

294. I find that the proposed development would, in terms of number of houses, double the size of the village. With the other elements of what is proposed, the village would be very considerably enlarged. As indicated, Crombie lacks services and facilities. The proposed development would go some way to addressing this with the envisaged shop, café and new jobs.

295. On the other hand, it is likely that residents’ main weekly shopping would continue to be undertaken in the nearest towns, at some distance from Crombie. The new jobs would be likely to meet no more than a small proportion of the employment needs of new residents. There is no indication that the proposed houses would lead to re-establishment of a local church, pub or primary school. School-age children living in the proposed houses would have to travel some distance for their education.

296. I note the intention to provide through the site a new access to the Crombie defence munitions centre. I have no information to show what volumes and kinds of traffic go to and from the centre. Consent for a new access to the A985 (a trunk road) is dependent on closing Ordnance Road to vehicular traffic where it joins the A985. This would require a traffic regulation order. The order would be subject to public consultation and possible objection.

297. Regarding appearance, my inspection revealed that Crombie is well-contained within the surrounding rural landscape. The shape of the built-up area - triangular, with the narrowest angle pointing east - and the existence of peripheral trees and shrubs mean that the village has very little impact on the landscape when seen on the A985 approach from the east. From the opposite direction, there is a small amount of skyline development, but again the effect is limited. For a distance of 600 metres, the A985 adjoins the built-up area of the village. There is some tree and hedge screening along this side of the village.

298. The proposed development would have a significant effect on the approach from the east. From this direction, the site is open to view. Any boundary tree planting, such as that suggested in the site plan accompanying the representation, would take time to become effective. If, as suggested, there were to be a landmark building, the presence of development would be clear. From the east, a landmark building would be prominent and would be seen largely in isolation from the rest of the village. I find that it would not relate satisfactorily to the setting of the village and to the surrounding landscape.
299. From all the foregoing, I find that development on candidate site LDP-CRM001 would be dependent on private car journeys to other communities for services such as education, main shopping, employment, health care and entertainment. Development would be likely to have an adverse impact on the setting of the village and on the surrounding landscape. The proposed development would not accord with the west villages area strategy set out on page 14 of the proposed plan.

300. I note that the proposed development would contribute to the supply of housing land. I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the five-year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under Issue 2(b) Homes with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that the proposed development would nevertheless be unacceptable because of the drawbacks summarised in the preceding paragraph. These clearly outweigh the benefits of addressing any shortfall.

301. My conclusions are that the various advantages of the proposal would be clearly outweighed by the disadvantages and that the proposed plan need not be altered.

Longannet Power Station, sites LWD 011 and LWD 012

302. Scotland’s Third National Planning Framework (page 14) recognises that the Fife Energy Corridor, from Methil to Longannet, has potential for significant investment in energy-related business development. One of the national developments identified in the Framework is "Carbon Capture and Storage Network and Thermal Generation" (page 72). One of the sites for this national development is Longannet.

303. Longannet power station closed on 24th March 2016 and entered a decommissioning process which will continue until December 2016. The council’s response to a request for further information (FIR 72) gives more detail as to how the proposed plan might be altered in the light of the representation from Scottish Power Generation Limited and the current circumstances.

304. I find that the proposed plan should be altered to reflect present circumstances.

**Reporter’s recommendations:**

I recommend that the following modifications be made:

1. On the Charlestown & Limekilns inset of the proposals map, redraw the boundary of site CHL 001 (Land at Scottish Lime Centre) so as to exclude from the site (a) the strip of ground on the west side of the old school, (b) the bungalow at no. 22 Rocks Road, and (c) the Sutlery building (nos. 8 to 20 Rocks Road).

2. On the Charlestown & Limekilns inset of the proposals map, redraw the boundary of site CHL 002 (Land at the Old School) so as to include in the site the strip of ground between the old school and Rocks Road.
3. On page 63 of the proposed plan, in the entry for site DGB 007 (Hillend / Donibristle Industrial Estates Western Edge):

(a) under “Description” delete “Employment” and put instead “Employment/Development Opportunity”; and

(b) after the words “…. boundary treatment.” insert: “The council has resolved to grant planning permission (application 13/02953/PPP) for erection of a Class 1 retail unit, erection of restaurant with licensed bar (Class 3), erection of a drive-thru restaurant (Class 3), erection of a business unit (Class 4) and children’s indoor play area (Class 11) with associated works including access, car parking and landscaping.”

4. Within the Kincardine, New Row and Tulliallan section of the proposed plan (pages 104 and 105), insert entries for two additional sites. The entries should be as follows.

<table>
<thead>
<tr>
<th>Ref</th>
<th>KCD 002</th>
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</thead>
<tbody>
<tr>
<td>Location</td>
<td>Kincardine Eastern Expansion Phase 1</td>
</tr>
<tr>
<td>Area (ha)</td>
<td>10.5</td>
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<tr>
<td>Description</td>
<td>Housing</td>
</tr>
<tr>
<td>Est capacity (Housing)</td>
<td>300</td>
</tr>
<tr>
<td>Lead Agency</td>
<td>Private Sector/Registered Social Landlord</td>
</tr>
</tbody>
</table>
| Status, additional development requirements, and other information | A development proposal for the entire site including the phased release of this site and KCD 003 should include:
- the provision of 50 affordable housing units.
- a community facilities contribution.
- a phasing plan including the delineation of the site boundaries to include only the land allocated through the local plan.
- the provision of a fully-accessed serviced business park.
- the provision of a neighbourhood park.
- landscaping of the site.
- set-aside land for the extension of the cemetery.
- a new local access road between Walker Street and Toll Road.
- the provision of a site for a shop/general convenience store.
- the provision of a site for recycling.
- diversion of the existing overhead power line outwith the site.

The uses stated are consistent with planning permission reference 13/00357/PPP.

Notwithstanding the uses above and associated planning permission it is important that development proposals on this site (and those associated with it) take account of the topography, utility and design constraints of the site.

A flood risk assessment must be undertaken prior to development on this site. Development must accord with the findings of the flood risk assessment.
**Green Network Priorities**

- Establish a multi-functional green network through the development which successfully incorporates enhanced greenspaces, high quality SUDS provision, access and habitat enhancements, and which is fronted and overlooked by a good development edge.
- Form a high-quality landscape framework along the southern boundary of the development to provide an improved setting for the village.
- Incorporate a north-south access route, which connects into the burial ground and permits access to wider recreational assets north of the village.

<table>
<thead>
<tr>
<th>Ref</th>
<th>KCD 003</th>
</tr>
</thead>
<tbody>
<tr>
<td>Location</td>
<td>Kincardine Eastern Expansion Phase 2</td>
</tr>
<tr>
<td>Area (ha)</td>
<td>4.5</td>
</tr>
<tr>
<td>Description</td>
<td>Housing</td>
</tr>
<tr>
<td>Est capacity (Housing)</td>
<td>190</td>
</tr>
<tr>
<td>Lead Agency</td>
<td>Private Sector/Registered Social Landlord</td>
</tr>
</tbody>
</table>

**Status, additional development requirements, and other information**

A development proposal for the entire site including the phased release of this site and KCD 002 should include:

- the provision of 50 affordable housing units.
- a community facilities contribution.
- a phasing plan including the delineation of the site boundaries to include only the land allocated through the local plan.
- the provision of a fully-accessed serviced business park.
- the provision of a neighbourhood park.
- landscaping of the site.
- set-aside land for the extension of the cemetery.
- a new local access road between Walker Street and Toll Road.
- the provision of a site for a shop/general convenience store.
- the provision of a site for recycling.
- diversion of the existing overhead power line outwith the site.

The uses stated are consistent with planning permission reference 13/00357/PPP.

Notwithstanding the uses above and associated planning permission it is important that development proposals on this site (and those associated with it) take account of the topography, utility and design constraints of the site.

A flood risk assessment must be undertaken prior to development on this site. Development must accord with the findings of the flood risk assessment.

| Green Network Priorities | Establish a multi-functional green network through the development which successfully incorporates enhanced greenspaces, high quality SUDS provision, access and habitat |

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enhancements, and which is fronted and overlooked by a good development edge.

- Form a high-quality landscape framework along the southern boundary of the development to provide an improved setting for the village.
- Incorporate a north-south access route, which connects into the burial ground and permits access to wider recreational assets north of the village.

5. Amend the proposals map to show sites KCD 002 and KCD 003 allocated for housing.

6. On page 104 of the proposed plan, in the text for site KCD 006 (Kincardine Power Station 4 East) make the following two changes.
   
   (a) After the sentence ending “….. power station.” insert the following.

   “These assessments should take into account the desirability of making provision for landscaping along the south-west boundary of the site to improve the amenity of the adjacent footpath and cycleway and of making provision for a new section of footpath and cycleway across the westernmost part of the site.”

   (b) After the sentence ending “….. development on this site.” insert the following new paragraph.

   “Applications for planning permission must demonstrate that development will not adversely affect the integrity of the Firth of Forth special protection area, either alone or in conjunction with other plans and projects.”

7. On the proposals map (Kincardine, New Row and Tulliallan inset), delete the protected open space designation that is shown within the Kincardine power station site and extend the safeguarded employment area designation as shown on the plan accompanying the council’s e-mail dated 10 March 2016, which is the council’s response to further information request 51(b).

8. On page 155 of the proposed plan, in the description for site ROS 012 Rosyth Waterfront 4 delete “Other Proposal” and put instead “Tourist-related Development”.

9. On page 155 of the proposed plan, in the additional development requirements for site ROS 013 Rosyth International Container Terminal add the following.

   “A flood risk assessment must be undertaken prior to development on this site. Development must accord with the findings of the flood risk assessment.”

10. On page 157 of the proposed plan, in the development requirements for site ROS 016 Castlandhill (north) insert the following.

   “The design of site layout and buildings must give particularly careful consideration to the effect of development on the privacy and daylighting of existing dwellings.”

11. On page 157 of the proposed plan, delete the entry for site ROS 017, Castlandhill (south).
12. Delete from the proposals map (inset map for Rosyth, Inverkeithing, North Queensferry and Pattiesmuir) site ROS 017, Castlandhill (south).

13. On page 159 of the proposed plan, insert an entry for an additional site, using the following text.

<table>
<thead>
<tr>
<th>Ref</th>
<th>INV 005</th>
</tr>
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<tbody>
<tr>
<td>Location</td>
<td>Spencerfield</td>
</tr>
<tr>
<td>Area (ha)</td>
<td>15.4</td>
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<tr>
<td>Description</td>
<td>Housing</td>
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<tr>
<td>Est capacity (Housing)</td>
<td>295</td>
</tr>
<tr>
<td>Lead Agency</td>
<td>Private sector</td>
</tr>
</tbody>
</table>
| Status, additional development requirements, and other information | The outcome of planning appeal PPA-230-2232 is that the reporter is minded to grant planning permission in principle for 295 residential units, including affordable units (25% of total number for site) with associated access road and infrastructure. Conditions and requirements relevant to future detailed proposals for the site will be set out in the planning permission that is expected to be granted.

Green Network Priorities:

Retain and enhance the setting of any core path routes which run through the site or along its boundaries.
Establish an active development frontage on to such routes and enhance the quality and functionality of the local green network route so that it successfully delivers access, landscape and habitat enhancements and high-quality SUDS provision.
Consider locating open space on the ridgeline and higher northern parts of the site – to protect the open skyline and views to the Forth Rail Bridge beyond on approach to Inverkeithing from the east.
Establish a high-quality landscape frontage onto Hillend Road, as an important gateway to Inverkeithing.
Incorporate active travel provision and provide safe crossing points to connect to Inverkeithing High School.
Establish a high-quality edge along the eastern boundary of the development, through an appropriate boundary treatment, incorporating core path and access links, including delivering a core path link to the east of the site boundary to connect south to the core path which provides access to Letham Wood.

Habitats Regulations Appraisal mitigation:

Proposals must comply with Local Development Plan Policies 1, 3, 12 and 13 and provide details of water discharge management.

14. On the Proposals Map inset for Rosyth, Inverkeithing, North Queensferry and Pattiesmuir show the Spencerfield site as housing. The boundary to be used is that
shown on the plan submitted by the council in response to further information request FIR 28. The title of this plan is “Planning Permission in Principle Application Boundary”. The plan is dated 05.03.15 and was prepared by Open for Taylor Wimpey.

15. On page 160 of the proposed plan, in the text for site INV 009 (Former Caldwell Mill) after “Classes” insert “4 (business),”.

16. On page 161 of the proposed plan, include the following in the development requirements for site INV 012 (Fraser Avenue).

“A flood risk assessment is required. Design of the redevelopment must take account of the findings of the flood risk assessment.”

17. On page 184 of the proposed plan, delete the entries for sites LWD 011 (Longannet Power Station W) and LWD 012 (Longannet Power Station E). In place of these entries put the following.

<table>
<thead>
<tr>
<th>Ref</th>
<th>LWD XXX</th>
</tr>
</thead>
<tbody>
<tr>
<td>Location</td>
<td>Longannet</td>
</tr>
<tr>
<td>Area (ha)</td>
<td>197.46</td>
</tr>
<tr>
<td>Description</td>
<td>Employment - Class 4, 5 or 6 &amp; Energy or Specialist uses</td>
</tr>
<tr>
<td>Lead Agency</td>
<td>Private sector (Scottish Power)</td>
</tr>
<tr>
<td>Status, additional development requirements, and other information</td>
<td>Scottish Ministers identify Longannet as a site within the Fife Energy Corridor (Methil to Longannet) for energy-related business development within National Planning Framework 3 (NPF3). This includes identifying the site within NPF3 as a National Development for Carbon Capture and Storage (CCS) Network and Thermal Generation. Development proposals should therefore reflect NPF3. The extant remediation plan for the ash lagoons is understood to require revision due to the early closure of the power station. This will be assessed by Fife Council as planning authority and will address community concerns over the monitoring and management of the Longannet Power Station site, ash lagoons and associated estate. Responsibility for remediation and restoration of these sites rests with Scottish Power as site owners and must through any future planning application(s) take account of physical impacts on the Forth Estuary itself and the immediate locale around Kincardine. Scottish Power is committed to meeting its obligations in this regard and has indicated a willingness to continue to engage with the Valleyfield Ash Lagoons Liaison Committee and other agencies.</td>
</tr>
</tbody>
</table>

**Closure, Future Uses and Task Force**

The power station at Longannet closed on 24 March 2016 and entered a decommissioning process which will continue until December 2016. Scottish Power has indicated that the decommissioning stage must be completed before options are considered for the future use of the site but that it is likely that the site will remain in employment use up to 2020 as demolition of the
buildings or other activities are pursued. The Longannet Task Force has since August 2015 been working with Scottish Power in planning for the future use of this nationally-important site at an early stage including understanding requirements for site clearance, restoration and reuse. The site contains a number of attributes that would provide a unique opportunity for specialist types of employment, particularly where this is related to the energy key economic sector or complementary industries.

Any future uses for the site will be considered by Scottish Power, in consultation with Scottish Government, Scottish Enterprise/Scottish Development International and Fife Council with appropriate community liaison. The promotion of the area and any future use of the site shall safeguard existing utility and/or physical connections at and around Longannet and explore opportunities for innovative industry, business or enterprise sectors which may emerge. Links will also be necessary to a master-planning process for the Longannet site which will scope, appraise and deliver potential alternative uses (or users) for the site.

A flood risk assessment is required. Design of development must take account of the findings of the flood risk assessment.

**Habitats Regulations Appraisal Mitigation:**
- Proposals must comply with Local Development Plan Policies 1, 3, 12 and 13 and provide details of water discharge management; and
- to be in accordance with the Local Development Plan and for permission to be granted, detailed proposals, including applications for planning permission in principle, must demonstrate that the development would not adversely affect the integrity of the Firth of Forth SPA either alone or in combination with other plans or projects.

**Green Network Priorities:**
- The ash lagoons should be retained and restored as wetland and grassland habitats with provision to retain the sand martin colony. The potential for a hide should be explored.
- Existing woodland and tree belts on the site should be retained and enhanced.
- Deliver new multi-use cycle and core path, as an alternative coastal route to the Fife Coastal Path.

18. On the proposals map, delete the safeguarded employment sites LWD 011 and LWD 012 and put in their place a single site with the boundary shown on the map that accompanies the council response to further information request (FIR) 72. The site is to be designated as an employment development proposal (dark purple) and numbered to correspond with the new entry that is to be made on page 184 of the proposed plan.
## PROPOSED FIFE LOCAL DEVELOPMENT PLAN

### SOUTH WEST VILLAGES

**Development plan reference:**
Settlement Plans: Blairhall (pages 31-32), Carnock (page 41), Gowkhall (page 97), Oakley (page 149), Saline (page 162), Countryside Proposals LWD015 (page 184) & LWD018 (page 185)

**Reporter:** Richard Dent

**Body or person(s) submitting a representation raising the issue (including reference number):**

<table>
<thead>
<tr>
<th>Issue</th>
<th>Body or person(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>BLAIRHALL</strong></td>
<td></td>
</tr>
<tr>
<td>BLA 001 Land South of Blairhall</td>
<td>The Woodland Trust Scotland (2858) SEPA (3325)</td>
</tr>
<tr>
<td>BLA 002 Comrie Castle</td>
<td>The Woodland Trust Scotland (2860)</td>
</tr>
<tr>
<td>BLA 003 Land West of Rintoul Avenue</td>
<td>The Woodland Trust Scotland (2861)</td>
</tr>
<tr>
<td>BLA 004 South Avenue</td>
<td>The Woodland Trust Scotland (2866)</td>
</tr>
<tr>
<td><strong>CARNOCK</strong></td>
<td></td>
</tr>
<tr>
<td>Kingdom Housing Association (1195) TMS Planning Ltd (1393)</td>
<td></td>
</tr>
<tr>
<td><strong>GOWKHALL</strong></td>
<td></td>
</tr>
<tr>
<td><strong>SALINE</strong></td>
<td></td>
</tr>
<tr>
<td>SAL 001 North Main Street</td>
<td>Tina Chapman (9) Elizabeth Harvey (185) Marylla Ferguson (861) Gordon Young (1301) Jennifer Jarvill (2091) SEPA (3629)</td>
</tr>
<tr>
<td>SAL 002 Kinnedar Mains</td>
<td>Marylla Ferguson (863) SEPA (3631)</td>
</tr>
</tbody>
</table>
# Proposed Fife Local Development Plan

## Oakley

<table>
<thead>
<tr>
<th>Land Reference</th>
<th>Contact Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>OAK 002 Land at Pavilion &amp; Bowling Green</td>
<td>SEPA (3584)</td>
</tr>
<tr>
<td>OAK 003 Land to North of Oakley</td>
<td>Julian Laver (978), I Spowart (2059), West Fife Villages Community Projects Group (2810, 2819), SEPA (3273)</td>
</tr>
<tr>
<td>OAK 004 Land North of Employment Estate</td>
<td>Julian Laver (979), I Spowart (2062)</td>
</tr>
<tr>
<td>OAK 005 Holy Name Primary School</td>
<td>SEPA (3586)</td>
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</table>

## Saline

<table>
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<tr>
<th>Land Reference</th>
<th>Contact Details</th>
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</thead>
<tbody>
<tr>
<td>SAL 004 Saline Park</td>
<td>Marylla Ferguson (865), Scottish Water (2124), The Woodland Trust Scotland (2918)</td>
</tr>
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## Countryside

<table>
<thead>
<tr>
<th>Land Reference</th>
<th>Contact Details</th>
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</thead>
<tbody>
<tr>
<td>COUNTRYSIDE</td>
<td>Lomond Homes (847), Land Engineering Services Ltd (1731, 1735), David Chisholm (Saline and Steelend Community Council) (946), West Fife Villages Community Projects Group (2820), West Fife Villages Community Council Forum (2811)</td>
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</tbody>
</table>

## Provision of the development plan to which the issue relates:

Settlement Plans: Blairhall, Carnock, Gowkhall, Oakley, Saline, Countryside Proposals LWD015 & LWD018

## Planning authority's summary of the representation(s):

### Blairhall

<table>
<thead>
<tr>
<th>Land Reference</th>
<th>Contact Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>BLA 001 Land South of Blairhall</td>
<td>The Woodland Trust Scotland (2858): Proposal BLA 001 is within an area of ancient woodland. Object to development on this site as it would lead to loss or damage to ancient woodland and recommend that the site is not allocated unless the protection of the adjacent woodland can be guaranteed. If the site is to be identified for development an appropriate buffer between the proposed development and woodland should be identified as a development requirement. Recommend that appropriate survey work is performed.</td>
</tr>
</tbody>
</table>

## Table

<table>
<thead>
<tr>
<th>Provision of the development plan to which the issue relates:</th>
<th>Settlement Plans: Blairhall, Carnock, Gowkhall, Oakley, Saline, Countryside Proposals LWD015 &amp; LWD018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Planning authority's summary of the representation(s):</td>
<td></td>
</tr>
</tbody>
</table>
carried out if protected species are present on site or adjacent to the site.

SEPA (3325): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site.

BLA 002 Comrie Castle

The Woodland Trust Scotland (2860): Proposal BLA 002 is adjacent to an area of ancient woodland. Object to development on this site as it would lead to loss or damage to ancient woodland and recommend that the site is not allocated unless the protection of the adjacent woodland can be guaranteed. If the site is to be identified for development an appropriate buffer between the proposed development and woodland should be identified as a development requirement. Recommend that appropriate survey work is carried out if protected species are present on site or adjacent to the site.

BLA 003 Land West of Rintoul Avenue

The Woodland Trust Scotland (2861): Proposal BLA 003 is within an area of ancient woodland. Object to development on this site as it would lead to loss or damage to ancient woodland and recommend that the site is not allocated unless the protection of the adjacent woodland can be guaranteed. If the site is to be identified for development an appropriate buffer between the proposed development and woodland should be identified as a development requirement. Recommend that appropriate survey work is carried out if protected species are present on site or adjacent to the site.

BLA 004 South Avenue

The Woodland Trust Scotland (2866): Proposal BLA 004 is adjacent to an area of ancient woodland. Object to development on this site as it would lead to loss or damage to ancient woodland and recommend that the site is not allocated unless the protection of the adjacent woodland can be guaranteed. If the site is to be identified for development an appropriate buffer between the proposed development and woodland should be identified as a development requirement. Recommend that appropriate survey work is carried out if protected species are present on site or adjacent to the site.

CARNOCK

Carnock Issues

Kingdom Housing Association (1195) Objects to the non-inclusion of FIFEplan Development Strategy Consultation candidate site LDP-CNK001 (Main Street) for 50% affordable housing and 50% market housing, highlighting that this site is readily developable; with no access, topography or landscape constraints.

TMS Planning Ltd (1393) Objects to the non-inclusion of FIFEplan Development Strategy Consultation candidate site LDP-CNK003 (East Camps Farm) noting that it is well located and could be readily integrated into the physical form and function of the village. The development will allow the eastern approach to the village to be enhanced and to not impact on sensitive landscape.

Kingdom Housing Association (1195), TMS Planning Ltd (1393) Carnock is an established community in the West Villages Strategy Area located on a key transport
route and with a very imbalanced tenure mix. The allocation of sites and the Spatial Strategy does not have adequate regard to the range of facilities, local need, and likely impact of development within the settlement.

GOWKHALL

GWH 001 Land North of Clune Road

Margaret Jones (102): object to inclusion of site. Questions change in status from previous appeal decision. Refers to loss of general store in Carnock and need for additional greenspace. Site would impose a traffic burden on village which would not be the case with candidate site LDP-GWH002.

Jillian Kerr (283), Peter Jones (505): object to the inclusion of site. Gowkhall has no amenities therefore would not benefit from extension of its boundaries to include what would be a separate community. Refers to limited capacity of roads, privately owned narrow section at west end of Clune Road which has no pavement, effect on water table, proximity of Carnock Burn, presence of wildlife, previous appeal decision and building plots being sold before FIFEplan has been considered.

W MacLeod (1292): Objects to inclusion of site. Site was not supported at Main Issues Report stage. Reference is made to lack of consistency with Development Plan strategy, use of greenfield land and loss of greenspace, lack of existing facilities, poor integration, poor public transport and cycling facilities, access and increased traffic, impact on landscape, adjacent woodland and Carnock Burn and previous appeal decision.

John Laird (3056): Objects to inclusion of site. Refers to previous appeal decision (ref. P/PPA/250/607). Does not feel that meeting housing land requirement on its own is sufficient to overturn previous decision. Refers to lack of services and infrastructure, poor integration and non-compliance with strategy and policies E15-E29.

Lawrence Lowe (3820): comments on current planning application 14/03744/FULL (SD 1) Bungalows are preferable to 2 storey houses but objects to proposals. Concerns about potential height of houses and lack of information on ground and floor levels, layout of new houses and proximity of existing houses.

West Villages Community Projects Group and West Villages Community Council Forum (2807), (2815), Robert Guthrie (2264): Object to inclusion of site. Comments on inadequacy of neighbour notification, discussions with developer and submission of planning application, previous appeal decision, environmental impact, capacity of roads and flood risk.

Premier Properties (Fife) Ltd (1249): supports Council position to allocate site. Land was last used for stabling and a horse training area. Site is owned by company who developed adjoining houses, and intention is to develop it in similar manner with footpath links to adjoining woodland. Refers to previous appeal decision and change in housing land situation in SESplan. Site is effective, free of constraints with suitable access and drainage arrangements.

Malcolm Smith (1177): Support allocation of site. Reflects scale/form and character of adjacent housing. Gowkhall is sustainable location within short distance of community facilities in Carnock and Dunfermline. Site could contribute to housing supply, is free of
wildlife or landscape designations and adjacent woodland should be fully retained. Does not agree with concerns about increased traffic.

SEPA (3463): support inclusion within the Development Requirements for Flood Risk Assessment (FRA) and buffer strip along watercourse.

OAKLEY

OAK 002 Land at Pavilion & Bowling Green

SEPA (3584) Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken.

OAK 003 Land to North of Oakley

Julian Laver (978) Objects to the proposal. Development will detract from the open aspect of existing residential property and alter the rural character of the area.

I Spowart (2059) Objects to bullet 5 within development requirements stating that there is no planning justification to support a requirement “for financial obligations or infrastructure contributions towards the development of new serviced employment land plots on site OAK004 or other agreed employment related investment in Oakley. Otherwise the allocations of site OAK003 and OAK004 are supported and can deliver the future growth requirements of West Villages and the Housing Market Area as currently required by SESplan. Confirms that the landowner is committed to the delivery of the mixed-use development through masterplanning. Supports the comments and concerns submitted by Oakley Community Council in relation to site OAK003. The area north of the A907 will potentially be opencast and make it unsuitable for development.

SEPA (3273) Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken. Encourage inclusion within the site requirements for a buffer strip along the watercourse and support the potential for a water body restoration opportunity along the Grange Burn.

West Fife Villages Community Projects Group (2819, 2810) support the comments and concerns submitted by Oakley Community Council in relation to site OAK003. The area north of the A907 will potentially be opencast and make it unsuitable for development.

OAK 004 Land North of Employment Estate

Julian Laver (979) Objects to the proposal considering that development will detract from the open aspect of existing residential property and alter the rural character of the area.

I Spowart (2062) Objects to bullet 5 within development requirements stating that there is no planning justification to support a requirement “for financial obligations or infrastructure contributions towards the development of new serviced employment land plots on site OAK004 or other agreed employment related investment in Oakley. Otherwise the allocations of site OAK003 and OAK004 are supported and can deliver the future growth requirements of West Villages and the Housing Market Area as currently required by SESplan. Confirms that the landowner is committed to the delivery of the mixed-use development through masterplanning. Supports the comments and concerns submitted by Oakley Community Council in relation to site OAK003. The area

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north of the A907 will potentially be opencast and make it unsuitable for development.

OAK 005 Holy Name Primary School

SEPA (3586) Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken.

SALINE

Saline Issues

Tina Chapman(10), James Currie(363), Elizabeth Lunne (571), Marylla Ferguson (866) Infrastructure measures such as water provision, drainage, bus transport and even adequate internet connections need to be considered and included in plans with an assurance that they are completed.

Kingdom Housing Association (1182) Not supportive of the former and now disused football ground at the eastern edge of Steelend being allocated for open space purposes in Fifeplan.

BP North Sea Infrastructure (1254) Confirm that the BP Forties Pipeline runs along the eastern length of land identified as Protected Open Space on the western edge of Saline, (next to the cemetery) the site on its east side. The area of land to the west of the pipeline lies within the inner and middle consultation zones. It is recognised that the Protected Open Space designation is reflective of an existing use; however we would wish to highlight the presence of the pipeline, as this may influence possible future uses of the site.

Cathy Smith (1443) Consider that the existing road infrastructure, shop or school facilities and associated services are inadequate.

SAL 001 North Main Street

Tina Chapman (9), Elizabeth Harvey (185), Marylla Ferguson (861), Jennifer Jarvill (2091) Existing road infrastructure, shop or school facilities and associated services are inadequate. Object to the loss of habitat or open space in addition to the impact on visual amenity.

Gordon Young (1301) Highlights that site currently benefits from existing planning permission for 10 houses.

SEPA (3629) Support the inclusion within the Development Requirements for a Flood Risk Assessment.

J E Hensman (87) FIFEplan allocations SAL001, 002, 003, 004 must be considered cumulatively, for the 25% increase in population and consequently increased infrastructure demands to be heeded and provided for.

SAL 002 Kinnedar Mains

SEPA (3631) Support the inclusion within the Development Requirements for a Flood Risk Assessment.
Marylla Ferguson (863) Existing road infrastructure, shop or school facilities and associated services are inadequate.

J E Hensman (87) FIFEplan allocations SAL001, 002, 003, 004 must be considered cumulatively, for the 25% increase in population and consequently increased infrastructure demands to be heeded and provided for.

**SAL 003 West Road**

J E Hensman (87) FIFEplan allocations SAL001, 002, 003, 004 must be considered cumulatively, for the 25% increase in population and consequently increased infrastructure demands to be heeded and provided for.

Elizabeth Harvey (184), Linda Moyes (314), Alan Robertson (364), Marylla Ferguson (864), Saline & Steelend Community Council (945), Anne Black (1216), West Fife Villages Community Projects Group (2817) Existing road infrastructure, shop or school facilities and associated services are inadequate with proposed development out of keeping with the rural nature of the western approach to Saline. The proposed increase in population will increase flooding incidences and the number of car journeys made in the area, in addition to detrimentally affecting the built character of the village, the setting of a site of special interest (prehistoric circle) and a community orchard.

Stephen McDonald (360), Grant Campbell (512), Saline & Steelend Community Council (945), R Corp (1008) Object to the proposal to add SAL003 to the LDP considering that existing allocation/s satisfy the SESplan strategy and that existing housing availability suffices locally. Highlight the Saline is not within a SESplan Strategic Development Area and that the existing road infrastructure, shop or school facilities and associated services are inadequate. Reference consequential increase likely in private car use contrary to low carbon and sustainability initiatives by the Scottish Government.

Donald Murdoch (655), Jane-Anne Shaw (2720), West Fife Villages Community Council Forum (2806) Previous local plans have discounted this site, including the views of the Scottish Government Reporter on the impact of development and highlights that access to employment is limited locally as are outdoor recreation facilities and the ability to travel conveniently to health services. Notes that Saline and Steelend residents have demonstrated willingness to engage positively in preparing the Community Action Plan of 2011 (SD 2). This sought development that could occur sustainably to the benefit of all.

Laurence Bain (783) Express dismay at the proposed development of the existing play and loss of an existing path linking one part of the village to the other.

Kingdom Housing Association (1181), T & J Masterton (2767) Seeks a reassessment of the scale of the proposed site.

Saline & Steelend Community Council (945), Roderick Jones (1226), West Fife Villages Community Projects Group (2817) Expresses disappointment that some housing sites previously identified, and supported within the local community, have been omitted whilst a large site close to the centre of Saline has been included. Considers that the approach to ‘place-making’ falls far short of the Scottish Government’s expectations for community engagement. The proposed site was not supported by a reporter during the adopted Local Plan examination due to the impact on the character of the village.
TMS Planning Ltd (1432) Considers that there are other development options in other more accessible West Fife Villages such as Carnock and Aberdour that have available capacity to cater for further development. States that the rationale for site selections within FIFE plan is arbitrary failing to accord with the underlying sustainability agenda or with the FIFE plan strategy to have regard to the range of facilities, local need, and likely impact on their location with respect to additional residential land allocations.

Gladman Developments Ltd (2765) Supports the allocation of the West Road site (reference SAL003) for delivery of 130 units confirming that delivery of this site can occur in the short term, with no detriment to the existing settlement or its characteristics, within existing site and environmental constraints.

Hargreaves (2781) Supports the requirement for grounds and minerals survey.

SEPA (3632) Support the inclusion within the Development Requirements for a Flood Risk Assessment.

SAL 004 Saline Park

Scottish Water (2124) Seeks assessment prior to development of Scottish Water assets.

Marylla Ferguson (865) Existing road infrastructure, shop or school facilities and associated services are inadequate with proposed development out of keeping with the rural nature of the western approach to Saline.

Woodland Trust (2918) Proposal should not be taken forward unless the protection of the adjacent woodland can be guaranteed.

COUNTRYSIDE

Countryside Issues

Castlehill Mine, Blairhall

Administrators of Lomond Homes (847), Land Engineering Services Ltd (1731, 1735): object to the non-inclusion of a site for residential purposes at Castlehill Mine, Blairhall, on the basis that the site was included as a housing proposal in the Dunfermline & West Fife Local Plan 2012, has an extant planning permission for 38 houses and 6 live/work units, and the fact that the site is also included within the Council’s most recent Housing Land Audit as an established housing site.

Candidate site LDP-STE001 Steelend and Blairsgreen Farm

Saline & Steelend Community Council (946), West Fife Villages Community Council Forum (2811), West Fife Villages Community Projects Group (2820): object to the non-inclusion of candidate site LDP-STE001 in Steelend and land at Blairsgreen Farm, Kinnedar Park, stating that these would be valuable additions to the communities, offering opportunities for a mix of tenures, including affordable housing. The Community Council indicate that previously identified constraints on these sites could be overcome and, for the Blairsgreen Farm site in particular, the Community Council indicate that its development would also facilitate provision of a direct path link between Cowstrandburn and Kinneddar Park, and fill gaps in a wider recreational path network, both as sought by
the wider community.

LWD 015 Brankstone Grange

SEPA (3564): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken and need for a buffer strip along the watercourse.

LWD 018 Comrie Colliery

Saline and Steelend Community Council (1295): Saline and Steelend Community Council have promoted greater development of parts of this site as an alternative to less sustainable greenfield sites. Site will be linked to Blairhall and Oakley by multi-user paths to be provided as part of restoration of colliery site. Notes that Fife Council recently approved housing on a more remote site at former Bogside Mine. Additional development at Comrie Colliery could facilitate road improvements in Saline.

West Fife Villages Community Council Forum (2811), West Fife Villages Community Projects Group (2820) object to the non-inclusion of Comrie Colliery, which is seen as having the capacity to accommodate a substantial mixed use development and alleviate the pressure and need to over develop in other villages in West Fife.

Land Engineering Services Ltd (1695, 1699, 1700, 1701, 1708, 1715, 1716): agrees that site offers opportunity to contribute to future housing allocation within West Fife Area and requests consideration of more than 20 houses. Site is not highly visible and offers opportunity to sensibly integrate with existing topography. Site is in sustainable location within close proximity to jobs, services and road and footpath network infrastructure. References similarity to new village at Forestmill in Clackmannanshire. Opportunity to provide smallholdings, "starter" business and industrial Units, housing, tourism, biomass plant, leisure and community uses should be explored further to revitalise area. Appropriate design and inclusion of water features can negate any local flooding issues. Also refers to support from Community Council.

Hargreaves (2778): Supports designation of this site as an opportunity for on-site opencast operations, off-site housing development, and post rehabilitation leisure or tourism activity and associated housing, to assist the funding of the rehabilitation of this derelict and contaminated site.

SEPA (3565): Support inclusion within Development Requirements for Flood Risk Assessment (FRA) to be undertaken.

Modifications sought by those submitting representations:

BLAIRHALL

BLA 001 Land South of Blairhall

The Woodland Trust Scotland (2858): Delete proposal BLA 001 from the plan or identify an appropriate buffer between the proposed development and the area of ancient woodland in the development requirements.
### BLA 002 Comrie Castle

The Woodland Trust Scotland (2860): Delete proposal BLA 002 from the plan or identify an appropriate buffer between the proposed development and the area of ancient woodland in the development requirements.

### BLA 003 Land West of Rintoul Avenue

The Woodland Trust Scotland (2861): Delete proposal BLA 003 from the plan or identify an appropriate buffer between the proposed development and the area of ancient woodland in the development requirements.

### BLA 004 South Avenue

The Woodland Trust Scotland (2866): Delete proposal BLA 004 from the plan or identify an appropriate buffer between the proposed development and the area of ancient woodland in the development requirements.

### CARNOCK

**Carnock Issues**

Kingdom Housing Association (1195) Allocate Fife Development Strategy Consultation Candidate Site LDP- CNK001 (CD13) site for housing development.

TMS Planning Ltd (1393) Allocate Fife Development Strategy Consultation Candidate Site LDP- CNK003 (CD13) site for housing development.

### GOWKHALL

**GWH 001 Land North of Clune Road**

Margaret Jones (102), Jillian Kerr (283), Peter Jones (505), W MacLeod (1292), John Laird (3056), Lawrence Lowe (3820), West Villages Community Projects Group (2815) and West Villages Community Council Forum (2807), Robert Guthrie (2264): delete GWH 001 from Local Development Plan.

### OAKLEY

**OAK 003 Land to North of Oakley**

Julian Laver (978) Seeks to restrict any development proposal north of the existing industrial estate and suggest that the area OAK003 be limited to an area to the west of the proposed green network link that currently runs at the western side of the existing industrial estate.

West Fife Villages Community Projects Group (2819, 2810) Seek recognition of the adjacent opencast constraints to the allocations.

**OAK 004 Land North of Employment Estate**

Julian Laver (979) Objects to the proposal considering that development will detract from
the open aspect of existing residential property and alter the rural character of the area.

**SALINE**

**Saline Issues**

Kingdom Housing Association (1182) Recommended that Fife Council modify FIFEplan to re-allocate the ground [and the immediately adjacent land] at Steelend as ‘white land’ within the built-up area as illustrated in the attached plan.

BP North Sea Infrastructure (1254) Include reference to the presence of the pipeline within the forthcoming plan designation, to ensure that any future leisure use on site takes account of the presence of this infrastructure.

Cathy Smith (1443) If these housing proposals are accepted then it is critical that the infrastructure improvements are completed prior to the housing starting.

**SAL 001 (North Main Street), SAL 002 (Kinnedar Mains) & SAL 003 (West Road)**

Elizabeth Harvey (184) Proposed houses should be built specifically for local families and plots should be made available for self-builders.

Grant Campbell (512) Seeks alternative consideration of the site at Steelend capable of revitalising the area with perhaps their local shop being re-opened due to increased demand.

Stephen McDonald (360) States that there is no shortage of 'brownfield' sites around the village and that these should be considered before greenfield.

Laurence Bain (783) Seeks retention of path networks and existing play areas.

R Corp (1008) Seeks justification for housing need and explanation about availability of empty homes available for potential reuse.

TMS Planning Ltd (1432) Seeks deletion of site and redistribution of housing allocations within settlements with infrastructure capacity including school places.

Roderick Jones (1226) Reduce site allocation to 12 homes maximum.

**SAL 004 Saline Park**

Woodland Trust (2918) Requests that where the allocations are taken forward, sufficient buffering between the proposed development and woodland should be identified in planning policy at the appropriate stage.

**COUNTRYSIDE**

**Countryside Issues**

**Castlehill Mine, Blairhall**

Administrators of Lomond Homes (847), Land Engineering Services Ltd (1731, 1735):
Allocate Castlehill Mine, Blairhall for housing.

Steelend and Blairsgreen Farm

Saline & Steelend Community Council (946), West Fife Villages Community Council Forum (2811), West Fife Villages Community Projects Group (2820): Allocate candidate site LDP- STE001 and land at Blairsgreen Farm, Kinnedar Park for housing.

Proposal LWD 018 Comrie Colliery

Land Engineering Services Ltd (1695, 1699, 1700, 1701, 1708, 1715, 1716): increase number of houses

West Fife Villages Community Council Forum (2811), West Fife Villages Community Projects Group (2820): Include a site for housing land at Comrie Colliery.

Summary of responses (including reasons) by planning authority:

Note: Where a number of representations were received to sites a conjoined response has been prepared covering the various issues raised within the individual representations.

BLAIRHALL

BLA 001 (Land South of Blairhall), BLA 002 (Comrie Castle), BLA 003 (Land West of Rintoul Avenue) & BLA 004 (South Avenue)

In developing the settlement strategy for FIFEplan, whilst it is inevitable that some woodland will be affected in allocating the land required to meet the SESplan housing requirement, Fife Council has considered through the site assessment process (CD15) the impact of the various options on prime quality agricultural land, woodlands and open space or countryside seeking to minimise loss.

Notwithstanding this the respondent’s comments (Woodland Trust) are considered to be helpful therefore Fife Council does invite the Scottish Government reporter to consider making a recommendation on this issue as it applies to the proposal/s in question. This would include review of the stated development requirements to ensure that adequate separation and technical survey work is required or the addition of a statement to that effect.

CARNOCK

Carnock Issues

Fife Development Strategy Consultation Candidate Site LDP- CNK001 & LDP- CNK003 (CD13).

Site assessments undertaken in preparing the Proposed Plan (CD15) were consistent with an assessment framework which considered issues such as the impact on landscape, settlement character, and infrastructure. In undertaking these assessments, all candidate site submissions in Carnock highlighted specific site constraints for each.
The sites detailed within representations were considered by the reporter during the draft Dunfermline and West Fife Local Plan examination report (CD21). The Reporter stated that Kingdom Housing Association did not appear to be a specific development proposal but rather sought to protect a future development opportunity concluding that development proposals would be assessed against draft local plan Policies E1, E15 and E16 in relation to development in the countryside. The Reporter also commented that the site CNK003 within the TMS Planning submission would appear as an ad hoc extension to the village unrelated to the existing village form or to any natural landscape, landform or community boundary (CD21  Page 91 Paragraph 3)

GOWKHALL

GWH 001 Land North of Clune Road

Site assessments undertaken in preparing the proposed LDP (CD15) were published by the Council in September 2014. The site assessments considered issues such as the impact on landscape, settlement character, and infrastructure. The site assessment published for the site at Clune Road concluded that a small-scale residential development is supported allowing organic growth of a rural settlement. The site is largely screened behind existing development and sensitive development could be accommodated.

The assessment of the site and recommendation to include the site in the proposed LDP was made in the context of preparing a new Local Development Plan, in particular the need to identify additional land to meet the SESplan housing land requirement. While it comes to a different conclusion to the planning appeal decision (SD 3) the site is free of constraints and inclusion of the site is appropriate in scale to meet local needs and assists in providing a good range of locations and site sizes within the area. The developer requirements set out in the Proposed Plan (CD 5 - page 97) of the proposed Plan also specify requirements on upgrades to the road, Sustainable Urban Drainage System, Flood Risk Assessment, a buffer strip between the development and woodland and footpath to play park. The developers agent also confirms that the access from Clune Road into the site is also owned by the developer who has legal right of access over Clune Road and proposes to improve the unmade section at the west end of the road.

OAKLEY

OAK 003 Land to North of Oakley

This site is included in the Local Development Plan as it is considered to be a suitable expansion of Oakley and can contribute to meeting the identified requirement for additional housing within the wider Housing Market Area. Preferred sites have also been selected in the towns and villages in the West Fife area to fit with the scale of existing settlements, avoid constraints such as areas of opencast coaling and to avoid significant detriment to the character or setting of the area. Development in this location will be screened with landscaping and integrated through design or layout orientation but also provides an opportunity to ensure the provision of additional employment land to meet future economic needs not otherwise or currently available to accommodate an increased population. In addition, local road networks, services or utilities infrastructure are stated as necessary developer requirements.
The detailed arrangement and specification of flood risk mitigation measures will be a matter for consideration during assessment of the forthcoming planning application. FIFEplan does however support green networks and the separation of built or natural environments where flood hazards exist.

**OAK 004 Land North of Employment Estate**

Scottish Planning Policy (SPP) 2014 (CD1 page 13, paragraph 40) states that local development plans should allocate appropriate sites to support the creation of sustainable mixed communities and successful places and help to ensure the continued delivery of new housing. Preferred sites have also been selected in the towns and villages in the West Fife area to fit with the scale of existing settlements, avoid constraints such as areas of opencast coaling and to avoid significant detriment to the character or setting of the area. Development in this location will be screened with landscaping and integrated through design or layout orientation but also provides an opportunity to ensure the provision of additional employment land to meet future economic needs not otherwise or currently available to accommodate an increased population. In addition, local road networks, services or utilities infrastructure are stated as necessary developer requirements.

**OAK 003 (Land to North of Oakley) and OAK 004 (Land North of Employment Estate)**

All sites in the Proposed Plan have also been assessed as part of the Strategic Environmental Assessment (SEA) process (CD15), which is a means to judge the likely impacts of a public plan on the environment and to identify ways to minimise that effect, if it is significant.

These sites were also considered as part of the Dunfermline & West Fife Local Plan Examination – draft Local plan site references OAK 002, OAK 003, OAK 004, OAK 006 and OAK 007 (CD21). The Reporter recommended preparation of a single masterplan or development brief by Fife Council, landowners and developers to cover all the development sites to achieve an appropriate and well planned village expansion. It was also recommended that the draft Local Plan be updated to reference the need to agree appropriate developer requirements, community provision and planning obligations. (CD21 page 332, paragraph 11). FIFEplan Proposed Plan (CD5 page 150) includes specific development requirements relating to phasing, landscaping, vehicle and pedestrian access, flooding, ground conditions and water quality.

**SALINE**

**Saline Issues**

Developer requirements will ensure that new development has no detriment on existing facilities and that provision is adequately made for increased population. Infrastructure providers have raised no objections to this site and design or layout considerations will apply in assessing any planning application.

The Health and Safety Executive provide regular updates to constraint data held by Fife Council including mapped location of hazard installations and pipelines. Consultation will occur at planning application stage with the Health and Safety Executive to ensure that proposed development has no adverse impact on the identified consultation zone. FIFEplan has also been informed by consultation with Council Services such as
Transportation and Education, along with external partners and organisations such as the Health and Safety Executive. It was not otherwise considered appropriate to publish the relevant mapping of consultation zones.

Site assessments (CD15) undertaken in preparing the Proposed Plan were consistent with an assessment framework which considered issues such as the impact on landscape, settlement character, and infrastructure. Allocations including protected open space are intended to make a positive contribution to the settlement strengthening its role and purpose.

SAL 001 (North Main Street), SAL 002 (Kinnedar Mains), SAL 003 (West Road), SAL 004 (Saline Park) and Saline Issues (part)

Saline has been identified to accommodate a share of the SESplan housing land requirement with development proposals and land allocations made serve to benefit the village and support a sustainable approach to settlement expansion. All allocations made have been subject to site assessments (CD15). Additionally Strategic Environmental Assessment and key agency, community or developer feedback has informed the allocation of sites. Developer requirements will ensure that new development has no detriment on existing facilities and that provision is adequately made for increased population. Infrastructure providers have raised no objections to this site and design or layout considerations will apply in assessing any planning application to minimise visual impact.

In advance of the allocation of FIFEplan proposed plan site (SAL003) a detailed archaeological assessment was undertaken. This identified the presence of two, non-statutorily protected, archaeological sites within the development area. These are the former sites of Craighouse Corn Mill and Saline Saw Mill. Both are former 19th century mill sites and both are considered to be of local archaeological importance and the impact of development on both can be adequately mitigated against by means of recording prior to development conditioned through the relevant planning permission. The nationally important and scheduled site known by Historic Scotland as Kinnedar Mains is the cropmark site of an unenclosed settlement of likely later prehistoric date. Development will have no physical impact on this site and no significant impact on the site setting.

SAL 003 West Road

Development of the site is considered appropriate with SESplan (Core Document CD2) (paragraph 61, page 24) which allows smaller scale growth in locations including West Fife villages. The site could contribute towards meeting the SESplan housing land requirement and specific comments on access to employment, outdoor recreation and healthcare can be addressed as any proposal progresses. Policy 4 Planning Obligations of FIFEplan (CD5 page 203) sets out the requirements for all new development in which the Council will seek appropriate contributions from developers towards adequate infrastructure. The Council also continue to work with NHS Fife and communities where opportunities arise to integrate and align strategies.

The housing land requirement will be met by the sites allocated through the FIFEplan Local Development Plan. The phasing of sites through the Action Programme will provide for a five year housing supply throughout the lifetime of FIFEplan.
Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with under Issue 2b Homes Schedule 4 and its associated supporting paper. Issues regarding the consultation are addressed by the Statement of Conformity with the Participation Statement.

Site assessments (CD15) undertaken in preparing the Proposed Plan were consistent with an assessment framework which considered issues such as the impact on landscape, settlement character, and infrastructure. New development is intended to make a positive contribution to the settlement strengthening its role and purpose therefore existing footpath links will be preserved wherever possible or additional compensatory provision made.

SAL 004 Saline Park

Scottish Water acknowledges that in some areas the capacity at its treatment works and existing network is insufficient to accommodate additional development without network reinforcement. Should there be insufficient capacity for development at water or wastewater treatment works (Part 4 Assets), Scottish Water will provide additional capacity if the developer can meet the following criteria:

1. The development is supported by the Local Development Plan and has outline or full planning permission;
2. The developer can confirm land ownership or control through a solicitor’s letter;
3. The developer can confirm plans are in place to mitigate any network constraints that will be created by the development through a Minute of Agreement with Scottish Water or alternatively a letter showing commitment to mitigate network impact through Part 3 investment;
4. The developer confirms any time remaining on current planning permissions with Fife Council; and
5. The developer can demonstrate reasonable proposals in terms of the development’s annual build rate.

On receipt of these criteria, Scottish Water will instigate a growth project to provide additional Part 4 capacity for development. Scottish Water will also work with SEPA, the Developer and Fife Council to identify solutions to enable development to proceed.

In forming the settlement strategy for FIFEplan, whilst it is inevitable that some of the existing settlements character or composition may change prime agricultural land woodland and infrastructure or service networks will wherever possible will be protected. Fife Council has considered (through the site assessment process) the impact of development and has sought to minimise its loss. In response to comments from the Woodlands Trust, Fife Council considers that there is merit in the suggestion of providing a buffer between the proposed development and woodland and invites the Reporter to make an appropriate recommendation on this issue.
COUNTRYSIDE

Countryside Issues

Castlehill Mine, Blairhall

The site in question was allocated within the adopted Local Plan with allocation reference LWD014 (CD8) and has been subject to applications for planning permission (SD 1 - 10/04168/PPP) with an application now received to amend this and related conditions (SD3 - 15/00816/PPP). It is not allocated within FIFEplan as it was not considered necessary to map all sites with planning permission given that these, where relevant will appear in the Fife Housing Land Audit, published annually. The non-allocation of the site within the LDP does not change the status of any extant or previous planning permissions.

Steelend and Blairsgreen Farm

Site assessments published in late 2013 as part of the FIFEplan: Development Strategy Consultation- Preferred and Reasonable Alternatives Consultation (CD13 and CD15) recognised that Steelend is an existing settlement with services and infrastructure that can accommodate modest growth to support local needs. The non-allocation of the site in FIFEplan Proposed Plan is however appropriate as significant constraints exist related to access provision. Of note in this respect is the unsatisfactory provision of vehicular access from Midfield Terrace difficult due to adjacent buildings (2 Midfield Terrace) and existing vehicular access to the bus turning circle. The site assessment also identified landscape issues which require to be satisfactorily resolved and no evidence that the site promoter has, or can demonstrate the ability to, own land necessary to integrate or access the site with or from the existing village.

The Blairsgreen Farm site was not submitted to Fife Council for consideration through the Main Issues Report (CD12) or Development Strategy Consultation (CD13) stages of FIFEplan and as such has not been subject to detailed site assessment. The site was not therefore considered for inclusion within FIFEplan Proposed Plan.

LWD 018 Comrie Colliery

The existing proposals as designated in the adopted Dunfermline & West Fife Local Plan 2012 (CD8) have been carried forward into the proposed Local Development Plan. The principle of some housing on the colliery site has been established in the adopted plan and the proposal will see the remediation of a contaminated vacant and derelict site in the countryside and will promote the economic growth of the West Fife villages area.

The site was previously considered as part of the Examination process for the adopted Dunfermline & West Fife Local Plan 2012 (CD 21) Reporters concluded that they were satisfied that the principle of some housing on the colliery site has been established, but not for a large-scale development. Reporters did not consider it appropriate to remove greenfield housing sites in other locations to allow an increase in the number of houses on this site. (CD 21 page 377)

Only a small part of this large site is within 400m of existing local services in Blairhall and the site is perceptually/physically detached from Blairhall. The site is located away from any existing settlement so there is no opportunity to integrate with the existing
No specific housing numbers have been specified in the proposed Local Development Plan, however the developer requirements set out in the proposed plan (CD 5 page 185) indicate that a housing allocation can be considered where this enables tourism and leisure led activity as part of the long term remediation of the site. The site is likely to have contaminated land issues associated with former minerals works that require to be addressed and the developer requirements outlined in the proposed plan also specify the need for a Flood Risk Assessment and habitat and landscape improvements.

**Reporter's conclusions:**

Note: sites at Steelend have been considered in a separate section following Saline sites.

**BLAIRHALL**

**Site BLA 001 Land south of Blairhall**

1. The land is allocated for residential development in the proposed plan with an estimated capacity of 64 houses. Planning permission in principle was granted in 2015 for the residential development of the site. The site to which the consent relates also includes part of site BLA 004 to the north to allow an access from South Avenue.

2. There is an area of woodland within the northwestern part of site BLA 001. This woodland is shown in the Interactive Mapping Tool (which is part of the proposed plan) as an Existing Green Network Asset. Approximately half of this area is designated as ancient woodland.

3. The planning permission in principle for site BLA 001 includes conditions to protect the future of the trees on the site. However, the granting of planning permission in principle does not guarantee the implementation of the approved residential development. It would therefore be appropriate to include a further development requirement in the proposed plan stipulating the need for a survey of the ancient woodland prior to development. The survey could lead to the need for a protective strip.

**Site BLA 002 Comrie Castle**

4. There is a narrow strip of ancient woodland in the western part of site BLA 002 which is allocated for residential development with an estimated capacity of 15 houses. The settlement statement also refers to the potential for a care home. The woodland strip is shown in the Interactive Mapping Tool (which is part of the proposed plan) as an Existing Green Network Asset and the green network priorities for the site include ensuring that the existing trees on the western boundary of the site are retained.

5. I believe a survey of the trees prior to development would further increase the level of safeguarding. The survey could lead to the need for a protective strip. Insofar as the council has recognised the value of the trees and the need for protection it would appear that the prospect of a buffer zone would be unlikely to reduce the development potential significantly, if at all.

6. Overall, I conclude that the proposed plan should be modified to draw attention to
the ancient woodland and the likely need for a protective strip following a detailed survey.

Site BLA 003 Land West of Rintoul Avenue

7. The site extends to 1.7 hectares and is allocated for housing in the proposed plan. The estimated capacity is six houses. Much of the site is covered by woodland of which a significant part is designated as ancient woodland. The eastern, southern and extreme western parts of the site lie beyond the extent of the ancient woodland.

8. The council has explained that planning permission in principle has been granted for residential development, the consent remaining extant until July 2016. It has been further indicated that the low estimated capacity has been applied in recognition of the trees on the site and the need to protect the ancient woodland.

9. A tree survey has been undertaken and identified 58 trees on the site, recommending the removal or substantial pruning of a number of dead or decaying specimens. Conditions of planning permission in principle are intended to ensure the protection of the trees on the site. The development area itself covers approximately half the site.

10. The granting of planning permission does not guarantee implementation but the principle of residential development has been clearly established. I am satisfied that a low-density development could be undertaken and allow the retention of the ancient woodland. Indeed, tree maintenance and management required as a condition of the planning permission in principle could secure the future of many of the trees on the site, including those not identified as ancient woodland. For the avoidance of doubt, it would be appropriate for the proposed plan to include a specific reference in the development requirements to ensure that attention is paid to ensuring the integrity of the woodland on the site, especially the ancient woodland.

Site BLA 004 South Avenue

11. The site is allocated for residential development in the proposed plan. Land to the south (site BLA 001 - see above) has been granted planning permission in principle for housing, the access to which would be provided by means of a link from South Avenue through site BLA 004.

12. There are trees adjacent to the northern and eastern boundaries of site BLA 004 and trees within the southern third of the site itself. All these trees are shown in the Interactive Mapping Tool (which is part of the proposed plan) as an Existing Green Network Asset but none of the areas of trees is identified as ancient woodland. Although I have noted the concerns of The Woodland Trust, the development of site BLA 004 would not threaten any designated ancient woodland and therefore there is no requirement to change the proposed plan in this respect.

CARNOCK

Candidate Site LDP-CNK001

13. Carnock is one of a number of villages located on the A907 to the west of Dunfermline. The villages have individual identity and remain physically and visually
14. I have noted the Landscape and Visual Appraisal undertaken on behalf of the Kingdom Housing Association expressing the opinion that the development of candidate site LDP-CNK001 would not result in coalescence with Oakley being apparent only from very limited locations. It is claimed that topography would significantly reduce visual impact. I do not share these opinions. The development would occupy more than half the existing open area between Gowkhall and Oakley and would leave little more than 100 metres of undeveloped land remaining between the two settlements. Whilst physical coalescence would not occur, the sense of separation – brief but clear - that currently exists when travelling along the A907 would be effectively lost. I therefore conclude that the intrusion into the narrow, sensitive landscape setting shared by the two villages would not be acceptable.

15. In addition to my concerns in respect of landscape setting, I do not believe that the development of the site would represent the “organic” or natural growth of Carnock. The existing boundary is clearly formed and the completion of development on neighbouring site CNK 001 will not detract from the entrance to the village from the west. Candidate site LDP-CNK001 would be unrelated to the existing built form of the village. The indicative plans show a separate access from the A907 beyond the current village boundary. In my opinion, this would not satisfy the guidance on connectivity set out in Scottish Planning Policy.

16. In reaching this conclusion, I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the 5-year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under Issue 2b, Homes, with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that this site would nevertheless be unacceptable because the adverse impacts identified above would outweigh the benefits of addressing any shortfall. The proposed plan should not be changed.

Candidate Site LDP-CNK003

17. As explained above, Carnock is located on the A907 to the west of Dunfermline, one of several villages having individual identity and remaining physically and visually separate. Carnock lies between Gowkhall to the east and Oakley to the west. As previously indicated, the areas of open land between the villages are narrow but are particularly important in retaining the separate character of each of the settlements.

18. Although it is claimed that the proposed development would effectively “round off” the village, enhancing the boundary, I believe the edge of Carnock at this point to be visually and physically acceptable. There is an existing defined edge to the built-up form of the village. Whilst open space extends eastwards from the community hall, this does not cause a visual intrusion into this sensitive landscape setting. On the other hand, the proposed development of some 60-70 houses would breach the well-established boundary and encroach into the important open space between Carnock and Gowkhall to the east. It has been claimed that there would be no impact on any sensitive landscape but I do not share this opinion. I consider the extension to the east, whilst not causing coalescence, would detract from the sense of separation and individual character currently retained by the villages.
19. Additionally, the proposed development would not represent the natural or “organic”
growth of the village. Whilst there is the possibility of an access via the community hall
car park, it is clear from the indicative layout that the principal access would be from
the A907 beyond the current village boundary. This would inevitably limit the degree of
connectivity that could be achieved between the proposed development and the rest of
Carnock, contrary to the guidance contained in Scottish Planning Policy.

20. In reaching this conclusion, I recognise that the council’s 2015 Housing Land Audit
identifies a shortfall in the 5-year effective housing land supply for the SESplan area of
Fife. I also acknowledge the uncertainties expressed under Issue 2b, Homes, with
regard to the level of this shortfall. Regardless of the level of shortfall identified, I find
that this site would nevertheless be unacceptable because the adverse impacts
identified above would outweigh the benefits of addressing any shortfall. The proposed
plan should not be changed.

GOWKHALL

Site GWH 001 Land North of Clunie Road

21. Although there are several representations objecting to this proposal, the
development is underway with the site access having been constructed and site
preparatory works underway. Clearly, the development planning process has overtaken
the plan-making procedure. On this basis it is necessary to take a pragmatic view and
make no change to the proposed plan.

OAKLEY & COMRIE

Site OAK 003 Land to North of Comrie

22. The site includes land currently allocated for development in the Dunfermline and
West Fife Local Plan and also extends the area designated for housing (the north-
eastern part of site OAK 003). The preparation of the proposed plan provides the
opportunity to review land use requirements and to consider the representations
submitted.

23. There are no outright objections to the allocation of site OAK 003. However, it has
been suggested that development should be restricted to land to the west of
employment site OAK 004. The main basis for this suggestion is loss of outlook and
reduced property value, neither of which are issues that are usually taken into account in
land use planning. In any event, I have no reason to believe that the proposed
development of the site would lead to an intolerable loss of existing residential amenity.
The need for additional housing allocations has also been questioned but the council
has explained the wider context in which the land has been identified for residential
development.

24. The possibility of the land north of the A907 being suitable for surface coal
extraction has been raised. No details have been provided in this respect but Policy 15,
Minerals, deals with sterilisation in cases where there are minerals of economic or
conservation value.

25. I have noted the concern expressed in respect of that section of the additional
development requirements referring to legal agreements, financial obligations and
infrastructure contributions. Although it is claimed that the requirement does not comply with the terms of the advice contained in Circular 3/2012, Planning Obligations and Good Neighbour Agreements, no detailed argument has been put forward in support of this contention. Equally, it has been suggested that the proposed plan implies the council itself would undertake development of the site but this claim has also not been explained in detail.

26. In my opinion the proposal gives no indication of the intent of the council to become involved in implementation other than through the statutory development management process. Neither do I consider that the reference to legal agreements and planning obligations contravenes the advice of Circular 3/2012. The development envisaged under OAK 003 is large scale and I believe it is reasonable at this stage to draw attention to the prospect of planning obligations. Clearly, as indicated, details will emerge in due course through future planning permissions. In general, I not find the terms of the policy guidance to be untoward but it would be preferable to state that any associated legal agreements would only be required where necessary. The proposed plan should be altered accordingly but otherwise should remain unchanged.

Site OAK 004 Land north of Employment Estate

27. This site is also allocated for development in the Dunfermline and West Fife Local Plan and the representations received reflect those considered under site OAK 003 above. In turn my conclusions and recommendation reflect those under site OAK 003. A similar modification to the proposed plan is therefore required.

SALINE

Scope for further development

28. Four sites, including one “opportunity housing site” are proposed for residential development in Saline. In total, the estimated capacity of these sites is about 260 houses. Concern has been expressed that this level of development is inappropriate in a village which is said to be relatively remote, particularly in respect of generating additional journeys. It is claimed there would be a detrimental impact on the character of the village and the existing ambience would be destroyed. I also note the fears that there are very few local employment opportunities and that this problem would also lead to a demand for additional journeys in a location where the local road network is thought to be poor and there is little public transport.

29. The council has responded to these concerns and explained that Saline is only 10 kilometres (6.5 miles) from Dunfermline, a major centre and is closer to a number of other villages. There are several local bus services and additional houses may generate custom leading to more frequent busses. Saline also has reasonable access to the major road network in central Scotland and to three park-and-ride facilities. The council considers employment in the context of the area of the “south-west villages” and explains that there are four existing industrial / business estates within this area and some 9.5 hectares allocated for employment development.

30. In general, the council argues that all development proposals are assessed in terms of the guidance in Scottish Planning Policy regarding sustainable development.

31. The proposed plan is required to meet the housing land requirements contained in
SESplan, the strategic planning document. I appreciate that this can give rise to tensions when, as a consequence, the expansion of relatively small villages is proposed. However, I accept that the council has undertaken an assessment of the potential for development and the likely environmental impacts of new houses on the communities where expansion is proposed.

32. Although Saline has been described as relatively remote, I accept the council’s contention that, in terms of distance, the village has a reasonable relationship with other settlements including Dunfermline. Although I can appreciate the concern about the level of public transport, the council has explained that there are several bus services available. My visits to Saline demonstrated that the village is some distance from the major road network but that access to this network is not especially inconvenient. I did not find the local road network to be of a particularly poor standard.

33. It is clear that new development in Saline will generate additional travel-to-work journeys. In this respect, there is the potential for the use of a range of park-and-ride facilities. However, there are also employment opportunities within a relatively short distance of the village and I do not consider this matter to be an issue that should preclude residential development.

34. I accept that the number of new houses proposed would have some degree of impact on the character of the village. Indeed, this likelihood is recognised by the council. Nevertheless, in general terms, I accept the disposition of the proposed sites and consider that they represent a natural growth adjacent to the settlement. This is in accordance with the guidance in Scottish Planning Policy.

35. For the most part, development is proposed to take place on the southern edge of Saline close to areas where modern houses have already been built. The council has undertaken site assessments in terms of landscape impact and settlement character. Provided the rate of development is carefully phased, I believe that the impact on character and ambience will be contained within acceptable levels. Overall, I consider the new housing to be capable of integration within the village in physical, visual and social terms.

36. I have noted the concerns in respect of a range of infrastructure and supporting services. I accept that development without adequate provision of infrastructure would be undesirable and lead to the creation of a community lacking in basic requirements. Such a situation would be to the wider detriment of Saline. However, the council is aware of the need to ensure that new development is accompanied by adequate infrastructure and has explained that there has been continuing liaison with service providers throughout the plan preparation process. I agree that this is a prudent approach and note that the council is confident that the necessary infrastructure can be provided as and when required.

37. In any event, Policy 3, Infrastructure and Services, is clear in stipulating that development should be delivered in a manner ensuring the delivery of infrastructure of the required level. Policy 4, Planning Obligations, requires developer contributions if development would have an adverse impact on strategic infrastructure capacity or have an adverse community impact. Contributions may be required to support or improve existing infrastructure or to provide additional capacity.

38. All-in-all, in the context of the strategic housing requirements that must be met by
the proposed plan, I recognise that the housing land allocations will inevitably impact on the character of Saline but that the impact will be at an acceptable level.

Site SAL 001 North Main Street

39. Although it has been claimed that the site constitutes an important habitat, no details have been provided in this respect and the land is not the subject of any formal nature conservation designations. I can accept that the site is used for informal recreation but it is not allocated as protected open space and I therefore attach limited weight to this concern.

40. Development would undoubtedly alter views. The protection of private views is not normally a planning consideration. Nevertheless, I recognise the sensitive location of the site on the periphery of the village and accept the need for care to be taken in the implementation of any development. In this respect, I consider that a low density development of about 10 houses, as indicated in the estimated capacity, could be accommodated without significant detrimental visual impact. The council indicates that this matter would be considered in the assessment of any future planning application.

41. Despite concerns about the impact of traffic, the Transportation Services department of the council has not objected to the proposal. Detailed access arrangements will require to be brought forward in due course and it will be necessary to meet the relevant design standards. In the meantime, I have no reason to believe that access considerations provide an insurmountable constraint.

42. Indeed, the council granted detailed planning permission some years ago for a development of ten houses. That development has not been implemented although, subject to a legal agreement, the council has extended the time period during which the permission will remain valid. Of course, there is no guarantee that the planning permission will be implemented but the situation indicates that the planning authority has been satisfied with the development proposed. In pragmatic terms, I conclude the proposed plan does not require change in respect of site SAL 001.

Site SAL 002 Kinnedar Mains

43. Representations in respect of site SAL 002 have been submitted in the context of the proposed development being within the wider housing land allocations for Saline. I have dealt with this issue above and concluded that, in general terms, the housing land allocations are justified.

44. In any event, planning permission for the development of the site has been granted and preparation work has commenced. The dynamics of the planning process have therefore overtaken the representations objecting to site SAL 002 and, under the circumstances, there is no justification to alter the proposed plan.

Site SAL 003 West Road

45. Many representations in respect of site SAL 003 have been submitted in the context of the proposed development being within the wider housing land allocations for Saline. As previously explained, I have dealt with this issue above and concluded that, in general terms, the housing land allocations are justified. The potential allocation of additional housing land was forecast at the time the current local plan was under
preparation. At that time the reporter was concerned about further allocations in view of market conditions. He considered that any review should take account of progress at Kinnedar Mains. As explained above, that site is now being developed.

46. Site SAL 003 is large, extending to some 8.2 hectares with an estimated capacity of 130 houses. I accept that a development of this size would have an inevitable visual impact. However, despite the concerns expressed, I consider that local topography is such that there would be relatively little wider impact and the landscape setting of Saline would be largely preserved.

47. When approaching Saline from the west, rising ground to the south of the road, and the current extent of the village on the north side of the road offset the visual impact of site SAL 003. In my opinion, the existing aspect to buildings to the east of site SAL 003 is not especially attractive or worthy of protection. I therefore conclude that the site could accommodate residential development without significant visual impact on the existing built form of the village.

48. Although the built area of the village would be extended, the site is located in a relatively central position, and I believe that this conforms to the place-making guidance contained in Scottish Planning Policy.

49. The development requirements listed in the proposed plan are appropriate and reasonable. In particular, I note the need for a phasing plan in recognition of potential cumulative impacts of the various housing land allocations. Equally, the Green Network Priorities are relevant and reflect the importance attached to the local landscape character.

50. All-in-all, I accept the allocation of this site to be justified and there should be no change to the proposed plan in this respect.

Site SAL 004 Saline Park

51. Representations in respect of site SAL 004 have mainly been submitted in the context of the proposed development being within the wider housing land allocations for Saline. As explained, I have dealt with this issue above and concluded that, in general terms, the housing land allocations are justified.

52. As indicated in the proposed plan, planning permission in principle has been granted for the development of the site. More recently, I am aware detailed permission has been issued for the construction of 55 affordable houses. Again, the planning process has moved on and the principle of the residential development of the site has been firmly established. Of course, the granting of planning permission does not guarantee the implementation of the approved development and it may be that, for whatever reason, further planning applications are submitted in the future. Should this be the case, it would be appropriate to take account of the adjacent ancient woodland as required by The Woodland Trust Scotland. A further development requirement should be inserted to this effect with a note that the requirement would apply to any future planning application.

Protected open space to west of Saline cemetery

53. The protected open space on the western periphery of Saline does not appear to
be well used. There are no facilities and the only structure is a single football goal. BP North Sea Infrastructure explains the implications of the BP Forties pipeline passing under the eastern part of the site. The council believes that there is adequate information available to ensure that any proposed development would be subject to appropriate precautions in respect of a potential hazard. On this basis, the council does not intend to show the consultation zones.

54. Pipeline consultation zones have been discussed under Issue 2(j) of the examination where it is recommended that the text supporting Policy 5 should indicate “Consultation distances are identified in the plan on the Proposals Map.” The consultation distances identified will therefore indicate the line of the BP Forties pipeline on the Proposals Map in the proximity of the protected open space in question.

55. I believe the inclusion of the zones in the Proposals Map and the procedures undertaken by the council when development is proposed provide adequate safeguarding. In any event, the proposed plan provides no indication that the protected open space is intended for development involving higher levels of public use.

56. On the foregoing basis there is no justification to alter the proposed plan further than recommended under Issue 2(j).

STEELEND

Candidate site LDP-STE001 Land east of Steelend

57. The site is allocated as Protected Open Space on the proposed plan. The potential for development was assessed during the plan preparation process when it was concluded that housing use would not be in accordance with SESplan objectives but, in any event, access would be a constraint.

58. I have noted the benefits that the community council believes would flow from the development of the site and I agree that an element of housing investment may be to the advantage of Steelend. However, although the site is described as brownfield “to all intents and purposes”, the site assessment identifies the land as agricultural which, strictly speaking, appears to be the case.

59. The community council accepts that the area is run down and bounded by the derelict football pitch and a garage. In my opinion, because of the surroundings, the level of residential amenity in a new housing development at this location would not be of a high standard and this points to not allocating the site as required. Access continues to be a practical constraint and, despite the optimism of the community council, the council still regards this to be a problem. In the light of this difficulty, it appears unlikely that reasonable connectivity with the existing village could be achieved.

60. On balance, I share the council’s opinion that amenity, access and village integration issues lead to the conclusion that the proposed plan should not be altered to include the residential allocation of this site. In reaching this conclusion, I have taken into account the council’s 2015 Housing Land Audit which identifies a shortfall in the 5-year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under issue 2b, Homes, with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that this site would nevertheless be unacceptable because the problems identified above would outweigh the benefits of
addressing any shortfall.

**Disused football ground**

61. Land at the east end of Steelend is identified as Protected Open Space within the settlement boundary. The eastern part of the open space allocation comprises a disused football ground. Although not referred to specifically, the council has confirmed that the pitch was included in the greenspace audit and was a component in the calculation of green space in Steelend. It is also shown as an Existing Green Network Asset in the Interactive Mapping Tool.

62. Kingdom Housing Association has suggested that the designation of this area as “white land” would, at least, offer the potential for development that would improve this somewhat unattractive entrance to the village. The council, having further assessed the situation, accepts that despite the loss of this designated open space, the remaining provision in Steelend would still be above the minimum open space standard.

63. Scottish Planning Policy requires local development plans to identify and protect open space identified in the open space audit and strategy as valued and functional or capable of being brought into use to meet local needs.

64. I can appreciate the suggestion that the improvement of this entrance to Steelend would be beneficial. However, despite the clearly disused condition of the pitch, the replacement of the open space status with white land designation within the settlement would be contrary to the guidance contained in Scottish Planning Policy. I therefore conclude that inclusion of the site within the greenspace audit is an important consideration and should not be set aside lightly. It may be that, in the future, a scheme may come forward that would meet both the open space requirements and enhancement objectives. However, at least in the meantime, the allocation should be retained.

**COUNTRYSIDE**

**Site LWD 018 Comrie Colliery**

65. The site is described as an “Other Proposal” in the proposed plan. The supporting text explains that no specific housing allocation is identified because of the nature of ground conditions. However, an allocation can be considered where this enables tourism and leisure led activity as part of the long-term remediation.

66. The current local plan specifies a housing allocation of 20 and it is this number that Land Engineering Services Ltd considers should be increased. In this respect, I note the master plan that has been prepared designates sites totalling approximately 10 hectares for private and affordable housing.

67. There is support by Saline and Steelend Community Council for larger scale mixed development on the site in the belief that this could stimulate and revitalise the wider area. However, I also note that the report of the previous local examination accepted that the principle of some housing on the colliery site had been established “but not for a large scale development”. Despite the views of those wishing a larger scale of development, I consider the assessment of the previous local plan inquiry report remains valid. I therefore agree with the assessment especially in view of the location of the site.
which, as previously described in the examination report, “is separated from any
development … in a relatively isolated location.”

68. On the basis of the foregoing, and, in view of the continuing process of remediation,
I therefore agree with the council that no housing allocation should be specified at this
time. Nevertheless, it is clear that, under certain circumstances, residential development
will be considered. In turn, no change to site LWD 018 is required.

Land at the Castlehill Colliery site, near Blairhall

69. The derelict site of the former Castlehill Colliery lies in the countryside without any
formal designation in the proposed plan. In the current Dunfermline and West Fife Local
Plan, the site is allocated as a brownfield opportunity site under reference LWD 014.
The following text is included:

“This brownfield site, which is a former colliery site, may provide an opportunity to
demonstrate high standards of sustainable development. A housing allocation
incorporating environmental principles is anticipated subject to detailed
assessment. A development brief for Fife Council approval is necessary.”

70. The adopted local plan indicates an estimated capacity of 35 houses.

71. Planning permission in principle was granted on 12 November 2015 for residential
development comprising 38 dwelling houses and 6 “live/work units” with associated
landscaping. This approval remains extant.

72. The report of the current local plan examination explains the council indicated that it
is appropriate to identify appropriate after-uses for sites which have fallen vacant and
require remediation. The site of the former colliery was regarded as a brownfield location
in the countryside, well separated from any settlement. It was agreed that the site
required remediation.

73. In physical terms, little appears to have changed on the site in recent years. In due
course the development granted planning permission in principle may be undertaken.
However, the granting of planning permission should not be regarded as a firm indication
that implementation will follow. To that extent, the status of the site remains much as
previously described.

74. I agree with both the terms of the previous examination report and the inclusion of
site LWD 014 in the current local plan. In turn, I consider that the site should also be
included in the proposed plan to provide development guidance. Of necessity, this
guidance is more fundamental than simply reflecting the terms of the extant planning
permission in principle. As I have explained, that permission may never be
implemented. However, it would be appropriate to include a reference to the extant
planning permission. The inclusion of the site in the proposed plan, including the
reference to the planning permission in principle, would meet the terms of the
representation and the document should be altered accordingly.

75. In a further response, the council set out the green network priorities to be included
should the site be included in the proposed plan. I believe that these priorities should be
set out along with the proposed additional Green Network Assets and proposed
additional Green Network Opportunities identified by the council. I do not consider these additions are likely to prejudice the development of the site.

**Land at Blairsgreen Farm, near Saline**

76. Although the Saline and Steelend Community Council believes that development at this location would make the local community more sustainable, no details have been provided to support this contention.

77. Described as a “local community” by the community council, there is not a “settlement” at this location. In my opinion, the required development allocation would not accord with the requirements of Scottish Planning Policy in terms of “placemaking” not being within or adjacent to a settlement and leading to the loss of greenfield land. I consider that this would not represent sustainable development and would not be “the right development in the right place”. In turn, there should be no change to the proposed plan.

**Reporter’s recommendations:**

1. On page 31, under Site BLA 001, Land south of Blairhall, insert the following additional development requirement (as the third requirement):

   “Account must be taken of the ancient woodland in the north western part of the site. It is likely that a protective strip will be required, the extent of which should be determined following a detailed survey.”

2. On page 31, under Site BLA 002, Comrie Castle insert the following additional development requirement:

   “Account must be taken of the ancient woodland in the western part of the site. It is likely that a protective strip will be required, the extent of which should be determined following a detailed survey.”

3. On page 31, under Site BLA 003, Land West of Rintoul Avenue, insert the following additional development requirement (as the first requirement):

   “Low density development is required to take account of the need to protect trees on the site, including designated ancient woodland. A detailed tree survey is required to identify appropriate protective strips and separation distances between trees and development.”

4. On page 150, under Site OAK 003, Land to north of Oakley, amend the second sentence of the sixth bullet point of “Status, additional development requirements, and other information –”to:

   “The details of how and when this will be implemented shall be confirmed through future planning permission(s) and, where necessary, associated legal agreements(s).”
5. On page 150, under Site OAK 004, Land north of Employment Estate, amend the second sentence of the fifth bullet point of “Status, additional development requirements, and other information -” to:

“The details of how and when this will be implemented shall be confirmed through future planning permission(s) and, where necessary, associated legal agreements(s).”

6. On page 163, under Site SAL 004, Saline Park, insert a further additional development requirement (the fifth) as follows:

“in the event of the submission of a revised or further proposal, account must be taken of adjacent ancient woodland which shall be the subject of detailed survey to determine the need for and depth of any protective buffer strip”

7. On page 188, insert a further site as follows:

```
Ref: LWD 032
Location: Castlehill Mine
Area: 6.3 hectares
Description: Brownfield Opportunity Site
Est. capacity (Housing): 35
Lead Agency: Private Sector
```

Include the following text:

“Status, additional development requirements, and other information-

This brownfield land, which is a former colliery site, may provide an opportunity to demonstrate high standards of sustainable development. A housing allocation incorporating environmental principles is anticipated subject to detailed assessment. A development brief for Fife Council approval is necessary.

A flood risk assessment requires to be undertaken prior to development on the site.

Note: planning permission in principle has been granted for the residential development of the site.

Green Network Priorities:

Deliver a high quality pedestrian and cycle route from the site to the West Fife way (National Cycle Network) which runs along the southern boundary of the site.

Take suitable measures to protect the areas of woodland and wetland to the south of the site and incorporate as part of a recreational green network. Deliver a high quality development frontage on to this green network.

Provide a minimum 10m buffer between the areas of wetland and woodland and any development.”
8. In the Proposals Map, at Castlehill Mine, west of Blairhall, add the following symbol:

"O
LWD 032"

and

add the “Proposed additional Green Network Assets” and “Proposed additional Green Network Opportunities” shown on the map accompanying the council’s response to Further Information Request 80.
## Issue 6

**Cairneyhill & Crossford**

<table>
<thead>
<tr>
<th>Development plan reference</th>
<th>Reporter: Richard Dent</th>
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<tbody>
<tr>
<td>Settlement Plans: Cairneyhill (Pages 35-37), Crossford (Page 53) &amp; Countryside Proposal LWD 010 (page 184)</td>
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### Body or person(s) submitting a representation raising the issue (including reference number):

#### CAIRNEYHILL

<table>
<thead>
<tr>
<th>Name</th>
<th>Reference</th>
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<tbody>
<tr>
<td>Jacqueline Thomson</td>
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**Provision of the development plan to which the issue relates:**

| Settlement Plans: Cairneyhill, Crossford & Countryside Proposal LWD 010 |
|-----------------------------|--------------------------------------------------------------------|
| Provision of the           | LWD010 Former British Telecom Depot, Crossford |
| development plan to which   | Victoria Hillary Pension Fund (187) SEPA (3263) |
| the issue relates:          |                                                     |

**Planning authority's summary of the representation(s):**

**CAIRNEYHILL**

Cairneyhill Issues

Jacqueline Thompson (21), Graham Donald (195), J D Butt (165), Andrew Brown (203),
David Hynd (176), John D & Yoniko Mitchel (197), Catherine A MacDonald (202), Robert Kerr (294), W B Noble (230), Karen Russell (215), Gwyn Thomas (246), Jardine (293), K Skinner (284), Margaret Davies (298), W M Calder (679), G Thomas (714), Alex Birse (809), David Ripley (812), Thomas Docherty MP (1004), Moray Glennie (1433), Jim Anderson (1386), Caroline Lindsay (1785), Robert Bell (1769), Clare Coyle (1546), Douglas Fotheringham (1625), Cairneyhill Residents Group (1832), Tracy Plant (2190), Stuart Smith (2226), Adrian Lister (2417), Andrew Wood (2389), Callum MacDonald (2468), David Baxter (2581), Maureen Altman (2759), Greg McShane (2718), West Fife Villages Community Projects Group (2818), James & Olga Helga (2777), West Fife Villages Community Council Forum (2809), Brian Fraser (2922), A Ward (2908), Anne & Cliff Marshall (2878), Helen Bell (2924), Lawrence Ogilivie (3072), Peter Butler (3593), George Dixon (1451)

Object to the inclusion of land for housing development within Cairneyhill on one or more of the following grounds:

- The village is already overdeveloped and inadequately served by utility, road or drainage networks and community (school) or employment facilities.
- Cairneyhill has been unfairly identified within West Fife villages to accommodate new development citing commercial gain not proper planning.
- Loss of bird habitats and local residential or environmental amenity.
- Localised water drainage and flooding problems including inadequacy of existing flood defences to accommodate rainwater or surface run off.
- Overburden traffic management measures within the village increasing incidences of congestion.
- Detrimental loss of prime agricultural land and increase in light pollution reducing the enjoyment of night sky star gazing.
- Inadequate play parks in the village for current and future children.

Muir Homes (763) Contends that FIFEplan Development Strategy Consultation candidate site reference CNH002 - Myre End Farm (CD15) is preferred to the FIFEplan Proposed Plan allocation reference CNH005 to deliver a development of circa 200 houses with related infrastructure, a new community hall, public open space and additional planting/greenspace. Consider that the site is well located, can be suitably accessed without detracting from landscape or ecological designations and is on non-prime agricultural land.

Church of Scotland (1519) Contends that inclusion of FIFEplan Development Strategy Consultation candidate site reference LDP-CNH001- Glebe (CD15) should occur for a small scale housing development (12 houses) including provision of a community hall at no net cost to Fife Council. Confirms that access, effectiveness, transport and drainage solutions are available and that coalescence will not occur.

Muir Homes (1439) Considers that the housing allocation for CNH005 is in excess of the originally supported figure of circa 220 units (considered at the draft Dunfermline and West Fife Local Plan examination). Highlights that this is inconsistent with the Council stated position of having a surplus of effective housing land supply.

NHS Fife (3837) Highlights potential impact on local healthcare facilities from the 360 houses proposed and seeks additional primary healthcare facilities.
### CNH 001 Pitdinnie Road

Susan Coull (681), Ian McDonald (688), Clare Coyle (1553), Robert Henry (1596) Object considering that the access arrangements to the site and local road network are significantly substandard with additional use adding to road, and pedestrian safety concerns

Church of Scotland (2072) Support the allocation of the site for housing development.

SEPA (3328) Support the inclusion within developer requirements for a Flood Risk Assessment and buffer strip to be completed to protect and improve the water environment.

Francis Marsden (1221) proposed run-off pond will present serious threat to Burn Cottage after intolerable invasion of privacy of the development. Huge intrusion to the quality of surroundings of Burn Cottage. Also threatens Burn Cottage vehicle and pedestrian access.

### CNH 002 Conscience Bridge (North)

A Hume (75), Warren Curry (194), Michael Cockburn (241), Robert Kerr (167), Gavin Templeton (160), A G Puddefoot (163), Susan Coull (129), Paul Darroch (119), Anne Barne (154), L Wilson & M Jones (170, 3815), Shellie Drysdale (171), Ryan & Alannah Steele (177), Shirley Gray (307), Nerissa Gibson (216), Tom Robertson (218), N O'Hagan (235), Jardine (254), Lyndsay Strang (256), Alasdair Gray (258), Carrie Frew & Jamie McNab (295), Andrew Rigg (368), Sharon & Mark Cameron & Cara & Ewan McDonald (366), John McKenzie (372), G Brown (663), Mary Paris (665), Gordon Henderson (686), Ian McDonald (695), David Welch (706), W Dalgleish (886), Cairneyhill Residents Group (878), Alan Reid (805), Christopher Smith (969), Victoria Gray (988), Cynthia Grandon (1270), David Lumsden (1253), J D Binnie (1324), Robert Bell (1463), John McArthur (1421), Moray Glennie (1434), Craig Reid (1296), Sarah Dallman (1416, 1423), Anna Dallman (1447), James Dallman (1449), Maureen Bell (1499), Clare Coyle (1556), Gordon McMullan (1613), C Hepburn (1857), A D Hamilton (2362), Lesley Smith (2209), Valerie Markie (2500), Fiona Binnie (2603, 2604), Irene Bannatyne (2998), James Coyle (3127, 3135), SEPA (3329, 3331), Margaret Butler (3485, 3491), Neil & Claire Pollock (3513), Francis Marsden (1221), John Campbell (1382), C G O Prest (3824) - Consider that no development should occur because of the flooding risk from increased surface water run-off and the reduced resources of statutory agencies and Fife Council to maintain existing flood defences. In addition objections are made on one or more of the following grounds:

- The village is already overdeveloped and inadequately served by utility, road or drainage networks and community (school) or employment facilities.
- Overburden traffic management measures within the village increasing incidences of congestion
- Highlight that existing incidences of flooding within the village are increasing insurance premiums and blighting private property.
- Loss of prime agricultural land.

A Wheeler (353) Accepts that SUDS ponds will attenuate water run-off but objects to directing the flow towards an area at the west of the village which already floods. Notes
that the proposal to provide an unlit "sunken cycle path and drainage way" along the existing northern boundary of the village, will provide access to every house on the north of the village creating security concerns.

Eric Dallman (1605) Objects considering that the site is visually prominent on high ground, and would be poorly integrated into the village. Proposal may also establish a precedent for further development to the north of the village in future years.

Muir Homes (1710) Contends that an alternative site at Myre End Farm is preferred to CNH005 to deliver a development of circa 200 houses with related infrastructure, a new community hall, public open space and additional planting/greenspace. Consider that Myre End site is well located, can be suitably accessed without detracting from landscape or ecological designations and is on non-prime agricultural land.

Wemyss Estate Trustees (2088) Welcome the proposed allocation of Site CNH002 (Conscience Bridge, north) as a residential development opportunity but highlight that careful consideration will need to be given as to the anticipated levels and nature of traffic anticipated from proposed allocations CNH004, CNH005 and CNH006. Object to the further requirement for site CNH002 to provide another means of access/egress directly from Glen Moriston Drive.

SEPA (3329) Support the inclusion within developer requirements for a Flood Risk Assessment and buffer strip to be completed to protect and improve the water environment.

CNH 003 Conscience Bridge (South)

Clare Coyle (1559) Object citing increased flood risk, road safety and traffic management issues in addition to the loss of prime agricultural land and the inadequacy of existing village community facilities including school.

SEPA (3330) Support the inclusion within developer requirements for a Flood Risk Assessment and buffer strip to be completed to protect and improve the water environment.

CNH 004 Land to North of Cairneyhill

Shirley Gray (308), Susan Coull (684), Ian McDonald (696), Moray Glennie (1435), Sarah Dallman (1417), Eric Dallman (1604), Clare Coyle (1574), Lesley Smith (2222), Sarah Porte (186) Object to the inclusion of land for housing development within Cairneyhill on one or more of the following grounds:

- The village character will detrimentally change and that Cairneyhill is inadequately served by utility, road or drainage networks and community (school) or employment facilities.
- Cairneyhill has been unfairly identified within West Fife villages to accommodate new development citing commercial gain not proper planning.
- Loss of bird habitats and local residential or environmental amenity.
- Localised water drainage and flooding problems including inadequacy of existing flood defences to accommodate rainwater or surface run off.
SEPA (3331) Support the inclusion within developer requirements for a Flood Risk Assessment and buffer strip to be completed to protect and improve the water environment.

CNH 005 Land North of Cairneyhill

A D Hamilton (2363), Robert Storie (193), Michael Cockburn (242), Robert Kerr (168), Gavin Templeton (161), A G Puddfoot (164), Susan Coull (137), Anne Barn (155), Shellie Drysdale (172), Ryan & Alannah Steele (178), A Wheeler (354), Shirley Gray (309), Nerissa Gibson (217), Tom Robertson (219), N O’Hagan (236), Jim Lowrie (244), Lyndsay Strang (257), Alasdair Gray (259), Andrew Rigg (369), Carole Perritt (313), Sharon & Mark Cameron/Cara & Ewan McDonald (367), John McKenzie (373), G Brown (664), William Ashby (626), Mary Paris (666), Gordon Henderson (691), Ian McDonald (698), David Welch (708), Philip Booth (971), Cairneyhill Residents Group (817), Alan Reid (806), FionaOrmiston (987), Christopher Smith (970), Victoria Gray (989), Robert Alexander (990), Cynthia Grandon (1271), David Lumsden (1255), J B Binnie (1325), Robert Bell (1468), John McArthur (1413), Moray Glennie (1436), Craig Reid (1297), John Ramsay (1392), Sarah Dallman (1419, 1424, 1426), Anna Dallman (1448), James Dallman (1450), Eric Dallman (1602), Maureen Bell (1501), Muir Homes (1732), Clare Coyle (1566), C Hepburn (1860), Stuart Smith (2208), Francis Marsden (1221), John Campbell (1382), Irene Bannatyne (2999), Lesley Smith (2201), Fiona Binnie (2604, 2603), James Coyle (3135), Margaret Butler (3491), Neil & Claire Pollock (3514), R B Hooper (3672), L Wilson & Margaret Jones (3815), C G O Prest (3825), SEPA (3334) - Object to the inclusion of land for housing development within Cairneyhill on one or more of the following grounds:

- The village character will detrimentally change and that Cairneyhill is inadequately served by utility, road or drainage networks and community (school) or employment facilities.
- Cairneyhill has been unfairly identified within West Fife villages to accommodate new development citing commercial gain not proper planning.
- Loss of bird habitats and local residential or environmental amenity.
- Localised water drainage and flooding problems including inadequacy of existing flood defences to accommodate rainwater or surface run off.

Muir Homes (1732) Considers that the housing allocation for CNH005 is in excess of the originally supported figure of circa 220 units (considered at the draft Dunfermline and West Fife Local Plan examination). Highlights that this is inconsistent with the Council stated position of having a surplus of effective housing land supply.

Avant Homes (3699) Supports the allocation highlighting that the proposal is in a location with landscape capacity and includes mitigation to address flood, traffic or amenity concerns, in addition to helping Fife Council to meet its housing land requirement. Object to the stated site size of 5.3Ha requesting that this is amended to 17Ha. References a development framework and confirms site deliverability.

CNH 006 Land East of Pitdinnie Road

R B Hooper (3673), A D Hamilton (2364), Object to the inclusion of land for housing development within Cairneyhill on one or more of the following grounds:
The village is already overdeveloped and inadequately served by utility, road or drainage networks and community (school) or employment facilities.

Cairneyhill has been unfairly identified within West Fife villages to accommodate new development citing commercial gain not proper planning.

Loss of bird habitats and local residential or environmental amenity.

Localised water drainage and flooding problems including inadequacy of existing flood defences to accommodate rainwater or surface run off.

Overburden traffic management measures within the village increasing incidences of congestion.

Detrimental loss of prime agricultural land and increase in light pollution reducing the enjoyment of night sky star gazing.

The village character will detrimentally change

Avant Homes (3700) Supports the allocation highlighting that the proposal is in a location with landscape capacity and includes mitigation to address flood, traffic or amenity concerns, in addition to helping Fife Council to meet its housing land requirement. Object to the stated site size of 5.3Ha requesting that this is amended to 17Ha. References a development framework (SD1) and confirms site deliverability.

SEPA (3334) Support the inclusion within developer requirements for a flood risk assessment and buffer strip to be completed to protect and improve the water environment.

CROSSFORD

Crossford Issues

Non-Allocation of Site/s

Rosemary Armstrong (76), George Hawkins (54), Pat Duke (145), H A R and A P King (265), Muriel Bremner (239), F W Simpson (350), Alys P and H A R King (355), Crossford Parent Council (622), Stuart Menzies (649), Michael Wright (884), Margaret Somerville (807), Jane Stuart (845), Harry Glithro (991), Crossford Community Council (1279), Andrew Little (1144), Andy Williamson (1429), Vincent Carr (604, 1464), John Kerr (1614), Fiona Reid (1637), John S Macdonald (1663), William Fowler (1998), Gillian Moran (2080), L Harrison (2206), Fiona Wotherpoon (2158), Vincent Carr (2347), David Anderson (2670), Diane Forsyth (3174), Stuart Gallagher (2750) Support the non-inclusion of land immediately to the west of Crossford (Pitconochie) for housing development on one or more of the following reasons:

- Inadequate capacity of school and road networks
- Detrimental loss of prime agricultural land and altered character of the village
- Increasing incidences of localised water drainage and sewage problems.
- 1996 and 1998 precedent of this development proposal already being refused
- Increasing the likelihood of coalescence between Crossford and Cairneyhill
- Location of proposed site within safety consultation zone for pipeline hazard and the suggested presence of a former landfill site (Bogwood).
- Increased surface water run-off worsening flooding to the A994 and Crossford
- Loss of bird habitats and local residential or environmental amenity.

Taylor Wimpey (1724) Objects to the non-allocation of FIFEplan Main Issues Report
Development Strategy consultation candidate site LDP-CFR001 (CD13) highlighting that this site is a deliverable site for residential development, that any potential technical issues with the site can be mitigated and that proposed development will not negatively affect the site or surrounding area including Dunfermline Green Belt.

Alfred Stewart Trust and Stewart Milne Homes (2020) Objects to the non-inclusion of the site immediately to the west of Crossford – Pitconochie, FIFEplan Main Issues Report Development Strategy consultation candidate site LDP-CFR002 and LDP-CRF003 (CD13) for housing development confirming that flooding and transportation issues can be addressed and that new housing development will mitigate for ecology or landscape impacts. Highlights planning policy issues specifically that this site can deliver homes to meet necessary housing land supply targets. Consider that the proposed development will support local community and commercial uses and contribute to arresting population and school roll decline in the village thus contributing to sustainable economic growth.

CRF 001 Keavil Farm/Nursery

Woodland Trust (2874) Object citing the loss of ancient woodland and damage to ancient woodland.

COUNTRYSIDE

LWD 010 Former British Telecom Depot, Crossford

Victoria Hillary Pension Fund (187): objects to zoning of Former Post Office Site LWD 010 at Crossford as employment site. Seeks re-zoning as mixed use site to incorporate housing and other elements of a mixed community. Site is ideally placed to form small community separate from Dunfermline and Crossford. Site is brownfield and effective with capacity of 100-120 units. There would be no need to change settlement boundaries as site has its own boundary in proposals map.

SEPA (3263): Request Flood Risk Assessment (FRA), buffer strip along watercourse and consideration of feasibility study to assess potential for restoration and improvement of water environment is included as site specific developer requirements to meet terms of legislation.

Modifications sought by those submitting representations:

CAIRNEYHILL

Jacqueline Thompson (21), Graham Donald (195), J D Butt (165), Andrew Brown (203), David Hynd (176), John D & Yoniko Mitchel (197), Catherine A MacDonald (202), Robert Kerr (167, 168, 294), W B Noble (230), Karen Russell (215), Gwyn Thomas (246), Jardine (254, 293), K Skinner (284), Margaret Davies (298), W M Calder (679), G Thomas (714), Alex Birse (809), David Ripley (812), Thomas Docherty MP (1004), Moray Glennie (1433), Jim Anderson (1386), Caroline Lindsay (1785), Robert Bell (1769), Clare Coyle (1546, 1556, 1559), Douglas Fotheringham (1625), Cairneyhill Residents Group (817, 1832), Tracy Plant (2190), Stuart Smith (2208, 2226), Adrian Lister (2417), Andrew Wood (2389), Callum MacDonald (2468), David Baxter (2581), Maureen Altman (2759), Greg McShane (2718), West Fife Villages Community Projects Group (2818), James & Olga Heaney (2777), West Fife Villages Community Council.
<table>
<thead>
<tr>
<th>Names</th>
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<tr>
<td>Forum (2809), Brian Fraser (2922), A Ward (2908), Anne &amp; Cliff Marshall (2878), Helen Bell (2924), Lawrence Ogilvie (3072), Peter Butler (3593), Susan Coul (129, 137, 681, 684), Ian McDonald (688, 696), Clare Coyle (1553, 1566), Robert Henry (1596) A Hume (75), Warren Curry (194), Michael Cockburn (241), Gavin Templeton (160, 161), A G Puddefoot (163, 164), Paul Darroch (119), Anne Barne (154, 155), L Wilson &amp; Margaret Jones (170, 3815), Shellie Drysdale (171, 172), Ryan &amp; Alannah Steele (177, 178), Shirley Gray (307, 308, 309), Nerissa Gibson (216, 217), Tom Robertson (218, 219), N O'Hagan (235, 236), Lyndsay Strang (256, 257), Alasdair Gray (258), Carrie Frew &amp; Jamie McNab (295), Andrew Rigg (368), Sharon &amp; Mark Cameron/Cara &amp; Ewan McDonald (366, 367), John McKenzie (372, 373), G Brown (663, 664), Mary Paris (665, 666), Gordon Henderson (686, 691), Ian McDonald (695), David Welch (706, 708), W Dalgleish (886), Cairneyhill Residents Group (878), Alan Reid (805, 806), Christopher Smith (969, 970), Victoria Gray (988, 989), Cynthia Grandon (1270, 1271), David Lumsden (1253, 1255), J D Binnie (1324, 1325), Robert Bell (1463, 1468), John McArthur (1413, 1421), Moray Glennie (1434), Craig Reid (1296, 1297), Sarah Dallman (1416, 1417, 1419, 1423, 1424, 1426), Anna Dallman (1447, 1448), James Dallman (1449, 1450), Maureen Bell (1499, 1501), Gordon McMullan (1613), C Hepburn (1857, 1860), A D Hamilton (2362, 2363, 2364), Lesley Smith (2209, 2201, 2222), Valerie Markie (2500), Fiona Binnie (2603, 2604), Irene Bannatyne (2998, 2999), James Coyle (3127, 3135), SEPA (3329, 3331), Margaret Butler (3485, 3491), Neil &amp; Claire Pollock (3513, 3514) A Wheeler (353, 354), Eric Dallman (1602, 1604, 1605), Ian McDonald (696), Moray Glennie (1435, 1436), Clare Coyle (1574), Sarah Porte (186), Robert Storie (193), Michael Cockburn (242), Jim Lowrie (244), Alasdair Gray (259), Andrew Rigg (369), Carole Perritt (313), William Ashby (626), Philip Booth (971), Fiona Ormiston (987), Robert Alexander (990), John Ramsay (1392), Muir Homes (1732), R B Hooper (3672, 3673), CGO Prest (3824,3825) - Delete site/s CNH 002, CNH 004, CNH 005, CNH 006.</td>
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(1279), Andrew Little (1144), Andy Williamson (1429), Vincent Carr (604, 1464, 2347), John Kerr (1614), Fiona Reid (1637), John S Macdonald (1663), William Fowler (1998), Gillian Moran (2080), L Harrison (2206), Fiona Wotherspoon (2158), David Anderson (2670), Diane Forsyth (3174), Stuart Gallacher (2750) Seek the non-inclusion of site immediately to the west of Crossford (Pitconochie) for housing development and no adjustment to the Proposed Plan settlement boundary.

**CRF 001 Keavil Farm/Nursery**

Woodland Trust (2874) Recommend that appropriate woodland survey work is carried out to determine the impacts that the development may have.

**COUNTRYSIDE**

**LWD 010 Former British Telecom Depot, Crossford**

Victoria Hillary Pension Fund (187): Seeks re-zoning of LWD 010 as mixed use site to incorporate housing and other elements of a mixed community.

SEPA (3263): include developer requirements on Flood Risk Assessment, buffer strip along watercourse and feasibility study on water environment.

**Summary of responses (including reasons) by planning authority:**

Note: Where a number of representations were received to sites a conjoined response has been prepared covering the various issues raised within the individual representations.

**CAIRNEYHILL**

Cairneyhill Issues and CNH002 (Conscience Bridge North) CNH 003 (Conscience Bridge (South), CNH 004 (Land to North of Cairneyhill), CNH 005 (Land North of Cairneyhill) and CNH 006 (Land East of Pitdinnie Road)

Cairneyhill has been identified to accommodate a share of the SESplan housing land requirement and was previously discussed during the examination into the draft Dunfermline and West Fife Local Plan (CD21, Page 92 Paragraph 16-17). At that time the Reporter concluded, “the northern and north western edges of Cairneyhill offer the best prospects for village expansion. However, this should be achieved in a way which integrates new development into the fabric of the village” recommending that future Local Plan reviews consider this matter further. Development proposals now presented within FIFEplan aim to meet these objectives; with a land allocation promoted similar to that during the draft Dunfermline and West Fife Local Plan to support a sustainable approach to settlement expansion. All allocations made have been subject to site assessments. Additionally, Strategic Environmental Assessment (CD16) and the involvement of communities, developers and key government agencies has informed the allocation of sites. Developer requirements include improved or new access, flood mitigation and the provision of community facilities.

In forming the settlement strategy for FIFEplan, some prime agricultural land and wildlife habitats will be used in allocating the land required to meet the SESplan housing
requirement, but Fife Council has considered (through the site assessment process) the impact of the various options on prime quality agricultural land and has sought to minimise its loss.

Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife, Scottish Environment Protection Agency and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision. Detailed matters, such as the specifications of road access and drainage arrangements for example, will be dealt with at planning application stage. At this time, an application is being considered by Fife Council (14/04038/PPP) for allocation CNH005 and CNH006 with significant technical work submitted to show that drainage solutions and local road capacity can be achieved in addition to the provision of community facilities and a phased housing development consistent with FIFEplan Proposed Plan (2014).

Note: Fife Council West Planning Committee at its meeting on 29th July 2015 approved planning application 14/04038/PPP - Planning permission in principle for residential development, serviced site for community hall and muga with associated engineering, landscaping and infrastructure works at land south of Pitdinnie Farm, Pitdinnie Road, Cairneyhill (part of site CNH005).

Non-Inclusion of Candidate Site LDP-CNH002 (Myre End Farm)

The assessment process considered candidate site submissions during consultative stages of FIFEplan (CD12 and 13). This included a potential development opportunity at Myre End Farm (Development Strategy Site Assessment candidate site LDP-CNH002) to the south east of the existing adopted Local Plan village boundary which was considered unsuitable due to access constraints (CD15) in so far as a second vehicular access cannot be accommodated linking the site to Pleasance Brae due to the presence of a ransom strip in separate ownership. There are also adverse impacts both on landscape setting of the village & on the narrow area of countryside between Cairneyhill & Crossford. This site was previously discussed and not supported by the Reporter during the examination into the draft Dunfermline and West Fife Local Plan (CD21, Page 95 Paragraph 40).

The housing land requirement will be met by the sites allocated through the FIFEplan Local Development Plan. The phasing of sites through the Action Programme will provide for a five year housing supply throughout the lifetime of FIFEplan. Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with under the Homes Schedule 4 Issue 2B and its associated supporting paper. Issues regarding consultation are addressed in the Statement of Conformity with the Participation Report.

Non-Inclusion of Candidate Site LDP-CNH001 (Glebe)

Site assessments undertaken in preparing the Proposed Plan (CD15) were consistent with an assessment framework which identified issues in allocating this site such as the impact on landscape, settlement character, and infrastructure. New development is intended to make a positive contribution to the settlement strengthening its role and
purpose. Inclusion of this site is not considered to do this; as at this time, it relies on a non-effective site adjacent for access. The site has potentially detrimental issues as noted earlier and other locations elsewhere in Cairneyhill were considered to better support the Development Plan Strategy.

CNH 001 Pitdinnie Road

Fife Council Transportation Services have been consulted throughout the Local Plan preparation process. They are satisfied that the proposed road network improvements are acceptable and offer no specific objection about this site. Any future planning application will also be subject to detailed assessment on road and pedestrian safety matters.

CROSSFORD

Crossford Issues

Non-Allocation of Sites

Fife Council’s Executive Committee at its meeting on 9th September 2014 resolved to delete candidate site LDP-CRF002b from the Proposed Plan (CD23).

The site immediately to the east of Crossford (Waggon Road) FIFEplan Main Issues Report Development Strategy consultation candidate site LDP-CFR001 (CD13) was not considered suitable for development per site assessments (CD 15) and was therefore not recommended for inclusion within the Proposed Plan. Landscape and setting constraints including the sites location within the Dunfermline green belt are relevant.

CRF 001 Keavil Farm/Nursery

Fife Council considers that there may be merit in amending the developer requirements for the site to ensure that no development should be within 10m of the adjoining woodland area, and invites the Reporter to make an appropriate recommendation on this issue. Such an approach would be consistent with developer requirements identified for other sites in the plan. Appropriate survey work will require to be carried out as part of any planning application for the site.

COUNTRYSIDE

LWD 010 Former British Telecom Depot, Crossford

The former depot site contains a number of run down vacant buildings, a car repair centre and caravan storage facilities. The adopted Dunfermline & West Fife Local Plan 2012 (CD8) allocates the site as a Protected Employment Area and the proposed Local Development Plan (CD5) also designates the site for employment purposes. The developer requirements relating to high quality design also remain unchanged.

The site was previously considered as part of the Examination process for the adopted plan and Reporters concluded that the site lies in the green belt between Crossford and Dunfermline and it would be inappropriate to allocate the site for mixed use development (CD21 page 378). The Reporters also outlined concerns about the effectiveness of the site for housing, the impact on the green belt and commented that development on this
site has the potential to create an impression that coalescence was starting to occur between Crossford and Dunfermline. The proposed Local Development Plan allocation for employment purposes is therefore considered appropriate.

With regard to the comments from the Scottish Environment Protection Agency, Fife Council considers that there is merit in the suggested additional requirements and invites the Reporter to make an appropriate recommendation on this issue.

**Reporter's conclusions:**

**CAIRNEYHILL**

**Scope for further development**

1. The proposed plan includes two new housing land allocations at Cairneyhill with an overall area of 10.2 hectares and an estimated capacity of 350 houses (CNH 002, capacity 100; CNH 005, capacity 250). Additionally, site CNH 006 proposes a flooding and drainage system to provide improvements to the flooding and drainage network throughout Cairneyhill, including the area of proposed development. The council explains that the residential development would contribute towards the strategic housing land requirement identified in SESplan, the strategic development plan.

2. The proposed northern extension of the village also includes site CNH 004 intended for leisure and community facilities. This site is shown symbolically on the Inset Map and is to be included in a master plan for sites CNH 002 and CNH 005.

3. The dynamic nature of the planning process has been demonstrated insofar as a proposal of application notice was submitted to the council during February 2015 related to the submission of an application in principle for approximately 100 houses on site CNH 002. A subsequent request was submitted for an environmental impact assessment screening opinion. The council decided that the proposal was unlikely to cause any significant environmental harm and indicated that there was no requirement for a formal assessment.

4. Planning permission in principle for residential development (approximately 100 houses), a serviced site for a community hall, multi-use games area and associated infrastructure including the upgrading of Pitdinnie Road has also been granted by the council. This proposal involves the eastern part of site CNH 005 and site CNH 006. The permission is subject to concluding a legal agreement in respect of financial contributions for various elements of the proposed development.

5. In a wider context, the local development plan must be consistent with the housing requirements set out in the strategic development plan. On this basis, I accept the principle of allocating additional sites for residential development in Cairneyhill.

6. It has been suggested that the addition of 350 houses would increase the size of Cairneyhill by approximately one third and, in itself, this would be inappropriate and contrary to the spatial strategy of the proposed plan. I have considered this claim in relation to the existing characteristics of Cairneyhill. Whilst there are many older and traditional buildings in the settlement, development to both the north and south of Main Street comprises relatively modern, albeit established, housing. These areas have a
pleasant yet unremarkable character. In my opinion, the addition of 350 houses, which I accept to be a proportionately large number, is unlikely to have a significant impact on the character of Cairneyhill.

7. Concern has been expressed about the loss of prime agricultural land and the council accepts that this should be avoided whenever possible. However, the requirement for additional housing land in order to try to achieve consistency with SESplan has led to some allocations on prime land. I recognise the land use tensions that have arisen in this respect but conclude that in this case there would be an acceptable loss of some prime quality agricultural land to secure housing land.

8. There is no doubt that the development of greenfield land has a wildlife impact. In this case, particular reference has been made to foraging geese and also to loss of habitat for other birds including skylarks. The land carries no formal protective nature conservation designations and no objections have been received from ecology authorities. I therefore conclude that the development of the land would not lead to an adverse impact ecologically of a scale to justify non-allocation.

9. Development would extend the built-up area of Cairneyhill and this would have an impact on the landscape setting of the village. The land slopes gently upwards to the north from the edge of the village but I believe the topography of the area is such that the visual impact over the wider area would be relatively limited. In this respect I therefore agree with the terms of the report of the examination of the current local plan indicating that the northern and north western edges of the village offer the best prospect for village expansion.

10. The proposed plan requires comprehensive boundary treatment with high quality landscape edges which, in due course, would reduce the wider visual impact. The higher elevation of the development by comparison with the existing northern edge of the village could lead to a degree of visual domination. However, the boundary treatment required, along with careful design would enable the minimising of impact on the neighbouring existing houses.

11. The flooding problems of Cairneyhill have been a fundamental concern of many representations. This issue has been recognised by the council insofar as the proposed plan contains a specific requirement for a flooding and drainage system. Along with the other proposed developments, the system is intended to provide improvements throughout the village by means of new sustainable drainage scheme solutions. Indeed, I note that the planning permission in principle for the development of part of site CNH 005 also includes a surface water detention component and an area for flood attenuation measures within site CNH 006. Whilst the granting of planning permission does not guarantee implementation, it is clear that drainage matters are an important consideration and that the council appears intent on addressing the issue. It is clear that this problem should not be understated. However, I consider that the terms of the proposed plan set out a clear approach to drainage matters, also requiring flood risk assessments, seeking to ensure that the new development areas do not exacerbate flooding and, furthermore, hoping to provide mediation for existing flooding concerns.

12. Lack of adequate infrastructure and supporting services is a further theme central to many representations. Roads, schooling and healthcare are among the concerns to which reference is made. It is clear that the council is aware of the need to provide adequate infrastructure when new development is proposed. In this respect, there has
been continuing liaison with service providers during the course of the preparation of the proposed plan. The council explains that upgraded provision has already been made where potential difficulties have been identified. I have not been made aware of any overriding problems that would lead to an insurmountable constraint in the implementation of the development proposals outlined in the proposed plan.

13. In any event, Policy 3, Infrastructure and Services, is clear in stipulating that development should be delivered in a manner ensuring the delivery of infrastructure of the required level. Policy 4, Planning Obligations, requires developer contributions if development would have an adverse impact on strategic infrastructure capacity or have an adverse community impact. Contributions may be required to support or improve existing infrastructure or to provide additional capacity.

14. I note that the planning obligations attached to the planning permission in principle for the development of part of site CRH 005 and site CRH 006 require contributions towards the transport fund and a new multi-use games area. As indicated, that development would include significant drainage and flood control infrastructure and there is also a condition requiring improvement to the local road network.

15. Some matters raised including loss of outlook and reduction in property value are not usually planning considerations and I have given little weight to these aspects of the representations. Other matters, such as the retention of dark skies, are a consideration but none of these concerns is such that they over-ride my wider conclusion.

16. All-in-all, I am satisfied that carefully phased development could be undertaken to accord with the provision of the necessary level of infrastructure and supporting services.

17. Taking all these matters into account, I believe the proposed level of residential development is justified and that the proposed plan should not be altered in respect of the representations seeking deletion of the housing land allocations.

Note: see below in respect of specific objections to sites CNH 002 and CNH 005.

Local healthcare

18. The council explains there has been continuing liaison with organisations such as NHS Fife during the plan preparation process. However, ongoing discussions with NHS Fife regarding possible impact on healthcare services would no doubt be beneficial. Such discussions can take place irrespective of whether they are mentioned in the plan. Accordingly, there is no need to alter the proposed plan.

Note: see below in respect of the possibility of healthcare provision in site CNH 004.

Site CNH 001 Pitdinnie Road

Note: this site has been brought forward to ensure sites are considered in numerical order.

19. This land is allocated for housing in the current local plan. It is shown in the proposed plan as an opportunity site extending to 0.7 hectares with an estimated capacity of 10 houses. Despite the current allocation, the preparation of the
replacement local development plan provides an opportunity to review land uses and take account of the representations received.

20. Access to the site would be via Pitdinnie Road and a junction with Main Street, a short distance to the south. There have been expressions of concern that this junction is sub-standard. It is claimed that there is little prospect of improvement to an acceptable standard. Despite these concerns the council explains that the Transport Services department has been involved throughout the plan-making process and has offered no objection to the site. Furthermore, it is indicated, any future proposal would be subject to a detailed assessment of road and pedestrian safety matters. Indeed, in this respect, I note a detailed application has been submitted for four houses on part of the site although this has not yet been determined by the council.

21. As explained previously, planning permission in principle has been granted for the development of part of site CNH 005 and site CNH 006. The permission is subject to a condition requiring the upgrading of Pitdinnie Road including the junction with Main Street. If implemented, these improvements would be to the wider benefit of those using Pitdinnie Road, including future occupants of any houses constructed on site CNH 001.

22. I am satisfied that the site itself is suitable for small scale residential development and this would make a beneficial contribution to the built form of Cairneyhill. I can accept that Pitdinnie Road, including the junction with Main Street, is not of a high standard. However, I place weight on the involvement of the Transport Services department and the scrutiny that would be applied should a particular proposal come forward. As indicated, I also note the requirement to improve the road to allow the development of site CNH 005.

23. In reaching this conclusion, I have noted the concerns expressed in terms of the proposed surface water drainage arrangements and the impact on the amenity of adjacent property. These are detailed matters for the council to consider in assessing a planning application and, in this respect, as explained, an application for four houses has been submitted. Irrespective of this particular proposal, I remain of the opinion the site is capable of accommodating a small residential development.

24. On balance therefore, I conclude that the allocation should remain and the opportunity site should not be deleted.

**Site CNH 002 Conscience Bridge (north)**

25. I have dealt with representations objecting to the proposed expansion of Cairneyhill above and concluded that the principle of wider development is acceptable. Many of the concerns expressed in terms of site CHN 002 relate to this wider issue.

26. Many of those who are concerned about site CHN 002 also point to the flooding issue. It is maintained that, over the years, the potential for flooding has precluded the development of the site. The council recognises this issue and the proposed plan requires a flood risk assessment to be undertaken. Along with sites CNH 004, CNH 005 and CNH 006, the text refers to this site contributing to improvements throughout Cairneyhill. I make reference to the planning permission in principle for development for part of site CNH 005 and CNH 006 both above and below and, in particular, to the associated drainage and flood mitigation works.
27. The Wemyss Estate Trust explains that a "stage 1" flood risk assessment had been undertaken and subsequently a more detailed assessment has been completed. It will be for the council to consider these assessments in due course in the context of development proposals being brought forward. (Reference is made above to the proposal of application notice that has been submitted – see above.)

28. It is clear that flooding implications will require very careful consideration but I believe the proposed plan sets out appropriate stipulations in this respect. The assessments already undertaken represent measures to comply with the requirements of the proposed plan. Although Wemyss Estate Trust believes site CNH 002 to be self-contained in respect of drainage matters, I consider the reference in the proposed plan to sites CNH 004, CNH 005 and CNH 006 to be reasonable. Hopefully, the wider development of these sites will, in total, provide or, at least, contribute to mediation for flooding issues in the vicinity.

29. Access is a further specific concern and the safety of entry to the site via a roundabout to the east of the existing roundabout at the junction of the A994 and A985 has been questioned. The council has explained that there has been continuing liaison with service providers, including the Transport Services department throughout the plan preparation process. No technical objections to the access proposals have been brought to my attention. In any event, I am confident that the council would assess any detailed proposal against the approved standards to ensure an acceptable level of safety is achieved.

30. The Wemyss Estate Trust has questioned the requirement to provide a vehicular access to Glen Moriston Drive. When requested to comment in detail on this matter, the council responded that "whilst not committing to removing the requirement for a road access to Glen Moriston Drive officers will re-visit, in collaboration with stakeholders, all access options as part of the master-planning process." On this basis I do not consider it appropriate to retain the very specific requirement for the provision of an access to Glen Moriston Drive. As suggested by the council, any further access requirements should be determined through the master plan and the proposed plan should be altered accordingly.

Site CNH 003 Conscience Bridge (south)

31. The land is allocated for employment purposes in both the current local plan and the proposed plan. Despite the current allocation, the preparation of the replacement local development plan provides an opportunity to review land uses and take account of the representations received.

32. Although development would represent the loss of agricultural land, the extent of the site is relatively limited and, particularly taking into account the proposed housing to the north, site CNH 003 falls within both the visual and physical confines of the settlement boundary. Detailed traffic matters, including any required traffic management, would be assessed when detailed development proposals are brought forward. In the meantime, I have no reason to believe that the development of the site would lead to an unacceptable increase in traffic generation. I do not consider the reference to community facilities to be directly relevant to the development of this site for employment purposes.

33. Concern has also been expressed about potential flooding should the site be
developed. It is a development requirement that an attenuation pond should be provided at an early stage. Details would be anticipated following a flood risk assessment. It is therefore clear that the flood risks of the site have been recognised and that appropriate mitigation measures must be put in hand to allow development to take place.

34. All-in-all, no change to the proposed plan is required.

Site CNH 004 Land north of Cairneyhill

35. Site CNH 004 is allocated for leisure/community facilities lying to the north of housing site CNH 005 and shown symbolically by a circle beyond the settlement boundary on the Inset Map for Cairneyhill. This allocation reflects the provisions of the current local plan.

36. For the most part, the limited number of representations in respect of this site are concerned about the wider scale of development proposed to the north of Cairneyhill. This site is regarded as an integral part of the village expansion, a matter which I have dealt with above and concluded that the housing land allocations should be retained within the proposed plan. I have confirmed this conclusion having considered the representations objecting specifically to sites CNH 002 and CNH 005.

37. Those representations to site CNH 004 in particular express concern about loss of prime agricultural land, flooding and vehicular access.

38. I have dealt with the question of prime agricultural land in my wider assessment of the scope for development to the north of the village. In this assessment I accepted the council’s explanation that the level of residential required to provide consistency with SESplan, the strategic planning document, involved the inevitable loss of some prime quality agricultural land.

39. The precise nature of the development within site CNH 004 is not identified and the proposed plan indicates that the land will be used to support and expand existing leisure and recreation uses, specifically the golf course and associated facilities. Nevertheless, a flood risk assessment is required and the site is viewed along with the adjacent development sites, CNH 002, CNH 005 and CNH 006, as contributing to the improvement of the local flooding and drainage network. It is clear that any proposed development will be considered by the council in the light of the potential to cause flooding and against the terms of the required flood risk assessment. I am therefore satisfied that, whilst flooding is an issue, the proposed plan makes appropriate provision to manage any development that might be proposed.

40. It is apparent that any intensification of recreational and community uses within this area would be likely to increase traffic generation. Traffic would use Pitdinnie Road, the limitations of which are generally accepted, including the junction with Main Street.

41. The proposed plan envisages the wider development to the north of Cairneyhill to be the subject of a master plan covering the various sites. It is reasonable to expect that any such master plan would take account of the need for satisfactory vehicle access to all parts of the development area, including site CNH 004. Despite the master plan exercise, should a development proposal for site CNH 004 come forward separately it would be equally necessary to assess the traffic implications. This assessment would inevitably focus on Pitdinnie Road and the need to achieve a standard necessary to
service the proposed development.

42. In any event, as already discussed, the planning permission in principle for sites CNH 005 and CNH 006, as required by the proposed plan, includes a condition involving the improvement of Pitdinnie Road. Should this improvement take place through the subsequent implementation of development flowing from the planning permission in principle, access to site CNH 004 would also be improved.

43. Overall, I agree that vehicular access to site CNH 004 is an important planning consideration but I am satisfied that there is scope for adequate provision to be made.

44. In addition to general comments about healthcare, NHS Fife has suggested the consideration of providing a facility within site CNH 004. The text attached to site CNH 004 suggests an emphasis on leisure uses. On the face of the matter, I cannot be confident that a health care facility would be appropriate. Additionally, the peripheral location of site CNH 004 does not appear to be especially attractive. Should NHS Fife wish to pursue this possibility, however, the ongoing discussions referred to above at paragraph 18 would offer a platform for identifying an appropriate site within Cairneyhill. This would not rule out the development allocations in the proposed plan including site CNH 004.

45. Taking account of the foregoing considerations I conclude that site CNH 004 does not require change.

Site CNH 005 Land north of Cairneyhill

46. As in the case of site CNH 002 I have dealt with representations objecting to the proposed expansion of Cairneyhill above and concluded that the principle of wider development is acceptable. Many of the concerns expressed in terms of site CHN 005 relate to this wider issue.

47. Other matters raised including flooding, infrastructure and nature conservation have also been dealt with above. As explained, planning permission in principle has been granted for the development of part of the site. The proposal involves the construction of drainage and flood mitigation works under the terms of CNH 006.

48. A condition of the permission requires the improvement of Pitdinnie Road including upgrading the junction with Main Street. This is a development requirement specified under CHN 005 in the proposed plan. That requirement refers to the junction between Pitdinnie Road and Main Street being “upgraded to a signal-controlled junction”. This is not acceptable to many of those submitting representations.

49. The committee report dealing with the application explains that the provision of traffic signals is no longer considered to be appropriate and a revised proposal has been brought forward. It is for the council to assess the proposal in terms of the condition of planning permission in principle although the report indicates that the alternative proposal is acceptable to the Transport Services department. On this basis, it is appropriate to alter the proposed plan and delete the reference to a signal-controlled junction between Pitdinnie Road and Main Street.

50. The proposed plan also requires an access from the A994 via site CNH 002. It has been suggested that this link may not be achievable and I accept that large
developments involving several ownership interests often give rise to implementation difficulties. However, the proposed plan clearly links the development potential of sites CNH 002, CNH 004 and CNH 005 and seeks a master plan approach. In my opinion this is the correct way forward and I see no fundamental reason why it should not be possible, at the end of the day, to achieve a co-ordinated development across the various allocated sites.

51. Overall, I conclude that apart from the modification in respect of the nature of the improvements between Pitdinnie Road and Main Street, site CNH 005 should remain as indicated within the proposed plan.

52. The area of site CNH 005 shown in the proposed plan is 5.3 hectares whereas Avant Homes has pointed out that the total is 17 hectares. The council has agreed that the site extends to 17 hectares and therefore this typographical error should be corrected.

Site CNH 006 Land east of Pitdinnie Road

53. Although the council has referred to representations relating to site CNH 006, these comments are concerned with residential development rather than the proposed flooding and drainage system. These matters have been dealt with above and there is no requirement to alter the terms of site CNH 006.

Candidate site LPD-CNH001

54. The site lies in the countryside adjacent to the Cairneyhill settlement boundary east of Pitdinnie Road.

55. It has been claimed that the site is an infill site and lies within the existing urban framework. Whilst adjacent to the settlement boundary, I do not consider the site relates to the built-up area of the village in either visual or physical terms. Development of the adjacent site, CNH 001, would, to some extent, lead to a closer relationship between the candidate site and the village. Nevertheless, residential development as required, and as illustrated indicatively, would represent a somewhat contrived and awkward built-up spur. On this basis I do not agree that the site is either an infill site or lies within the existing urban framework.

56. I note that this site was considered at the time of the previous local plan examination when it was concluded that access was a constraint that precluded the allocation of the land for housing development. Access was required to be taken via site CNH 001 and there could be no guarantee that an agreement could be reached to allow access to be provided across one site to the other.

57. The situation has changed to the extent that a detailed planning application has been submitted proposing four houses and an access road on site CNH 001 (see above). That access road is similar to the road shown on the indicative drawing to support the representation. The road proposed (a cul-de-sac) falls short of the boundary with the neighbouring land (the candidate site) but could be extended to provide access. At this time, planning permission has not been granted for the proposal to build four houses on site CNH 001. Cairneyhill Church expects the development to “progress very soon” but even the granting of planning permission does not guarantee implementation.
58. The owner of site CNH 001 is said to be a developer to whom it is intended to dispose of the candidate site thereby ensuring that access could be provided. Again there is no guarantee that the land disposal will be successful or that the proposed cul-de-sac would be extended as envisaged.

59. Even if the access situation is resolved, as indicated, I do not consider that the candidate site would provide a “natural extension”. I therefore conclude that it would not be appropriate to allocate the land for housing and the proposed plan should remain unchanged in this respect.

60. In reaching this conclusion, I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the 5-year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under Issue 2b (Homes) with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that this site would nevertheless be unacceptable because the adverse impacts identified above would outweigh the benefits of addressing any shortfall.

Candidate Site LPD-CN02 Mire End Farm

61. The site lies to the southeast of Cairneyhill between the edge of the village and a golf course to the east. Reduced in size from the site put forward at the time of the current local plan examination, the revised site extends to some 10 hectares. Residential development is proposed with some 120-130 mainstream units, approximately 50 affordable houses, and 17-32 smallholdings and houses with work units. A community centre, various other community facilities and additional planting are also proposed.

62. Although smaller in scale, I believe the site still suffers from the disadvantages that have previously been identified. Despite the land being described in the representation as “infill”, I do not accept this to be the case. Similarly, I do not consider that the site would be “fully integrated with the existing village”. Noting the suggestion that additional access points from the west could be achieved, I believe the principal access would clearly be from the proposed roundabout on the A994. I accept that the provision of a community hall would have the potential to create a link with the existing village but planning permission in principle has recently been granted for a hall in the proposed development allocations to the north of the village centre.

63. I share the previously expressed opinion that the development would not appear as an obvious extension of Cairneyhill. In turn, it would not represent a natural or “organic” growth of the village. As indicated in the report of the examination of the current local plan, development at this location would not be logical.

64. The previous report also found that the north and northwest of the village provided the best prospects for expansion. Again I agree and, indeed, I have supported the housing land allocations in the proposed plan which designate sites adjacent to the north and northwest of Cairneyhill.

65. Despite the claim that there would still be adequate separation between Cairneyhill and Crossford to the east, I consider that the reduction in the intervening space from 1400 metres to 1150 metres would be significant. The perception of the loss of some of this already narrow, yet important gap would be heightened by the location of the roundabout on the A994 and the loss of trees along the frontage at this point.
Development would therefore adversely impact on the sensitive landscape setting between the two villages.

66. I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the 5-year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under Issue 2(b) Homes with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that this site would nevertheless be unacceptable because the adverse impacts identified above would outweigh the benefits of addressing any shortfall. I conclude that the allocation of the site as housing land should not be supported and the proposed plan should not be changed in this respect.

CROSSFORD

Site CRF 001 Keavil Farm Nursery

67. The proposed plan indicates that this site will be safeguarded for allotment use and alternative uses will not be supported. On this basis, it appears unlikely that there would be any threat to ancient woodland adjacent to the site. However, as suggested by The Woodland Trust Scotland and agreed by the council, it would be appropriate to include a reference to the woodland as “other information”. Although the proposed plan restricts the development of the site, protective measures should have been indicated as a precaution. The proposed plan should be altered accordingly.

Candidate Site LDP-CFR001 land southeast of Crossford

68. The site lies within the green belt and is also within a designated “local landscape area” in the adopted local plan. The proposed plan applies similar status to the site with local landscape areas being defined as “a valuable local landscape area that merits protection for its special character and qualities.” Both designations are important and point against the release of the land for development. However, the local development plan review provides the opportunity to assess the designations in the light of current circumstances.

69. Taylor Wimpey plc has argued that there is a strategic shortfall in housing land supply and that the site would make a contribution to achieving the objectives of SESplan. I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the 5-year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under Issue 2(b) Homes with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that this site would nevertheless be unacceptable because local considerations are also important and the adverse impacts identified would outweigh the benefits of addressing any shortfall. I conclude that the site should not be allocated for residential development.

70. The existing and proposed green belt and local landscape designations endorse my conclusion. In this respect, the green belt provides a narrow, sensitive open area between Dunfermline and Crossford. There are important views to the east across the site to the Dunfermline skyline which would be lost should development take place on the site. This would also be to the detriment of the character of the area of local landscape value. Although Taylor Wimpey recognises the need for “sensitive” development, even very careful design would not mitigate the impact on both the green belt and the local landscape area. It also is suggested that a new village boundary could be created but, in my opinion, the current boundary is clear and without the need for
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<th>449</th>
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<tr>
<td><strong>PROPOSED FIFE LOCAL DEVELOPMENT PLAN</strong></td>
</tr>
<tr>
<td>71. I have noted the terms of the flood risk assessment that has been undertaken but it is clear that a significant amount of detailed investigation would still be required. Significant mitigation measures would be inevitable and whilst it may well be that a technical solution would be possible, flooding potential could represent a meaningful constraint.</td>
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<tr>
<td>72. The council believes that development of the site would not secure connectivity with the existing village. Whilst visually there would be the prospect of close integration, I agree the access arrangements would lead to a degree of separation from the physical structure of Crossford in terms of built form. Development would therefore not represent a natural or “organic” growth of the village and therefore contrary to the guidance contained in Scottish Planning Policy.</td>
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<tr>
<td>73. All-in-all, I conclude that the allocation of the site for residential development is not justified and the proposed plan should not be altered in this respect.</td>
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<tr>
<td><strong>Candidate Site LDP-CRF002b Pitconochie Farm</strong></td>
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<td>74. The rectangular site of some 11.1 hectares lies in the countryside adjacent to the western boundary of Crossford and is designated as such in both the current local plan and the proposed plan. The land slopes upwards on the north side of the A994. It is proposed that some 200 houses are constructed on the site.</td>
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<td>75. I have noted the site assessment undertaken by the council and also the representations submitted in support of the allocation of the proposed housing site.</td>
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<td>76. The site assessment believes that development would be in compliance with SESplan guidance in respect of housing in areas not within the defined Strategic Development Areas. Overall, I recognise that the development of the site would involve the loss of greenfield land. However, the land is not of prime agricultural quality and does not carry formal green belt or local landscape value designations. Similarly, there are no nature conservation designations. Adjacent woodland is the subject of tree preservation orders but careful layout of development could probably ensure adequate levels of protection.</td>
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<tr>
<td>77. There may be a need for a flood risk assessment and it would be essential to take account of the proximity of the high pressure gas pipeline. However, I have no reason to believe that either of these two considerations would represent an overriding constraint. There would appear to be school capacity, most significantly in the nearby primary school. Primary access from the A994, Cairneyhill Road, would be anticipated although the existing cul-de-sacs to the east could provide secondary access points or, at least pedestrian links. The cul-de-sacs would permit connection with the existing village including direct access to the primary school.</td>
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<td>78. In terms of ecology, and physical and infrastructure constraints I conclude that the site would be capable of development. Matters of detail could be dealt with through the council’s development management procedures.</td>
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<td>79. When deleting the candidate site from the proposed plan and in the response to the representation seeking re-instatement, the council provided few details to support the</td>
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non-inclusion of the site indicating only that landscape and setting constraints were considered relevant. Nevertheless, numerous representations were received endorsing the council’s decision not to allocate the land for housing development.

80. In general, I do not consider that concerns about lack of infrastructure are well-founded.

81. The primary school role indicates reasonable capacity for additional pupils although there is also concern about traffic at starting and closing times. It has been estimated that the development would lead to about 40 new primary school pupils although not all would attend the local school. In my judgement, the impact on school parking would not be an overriding determining consideration in the allocation of the site for housing.

82. I also believe appropriate access arrangements could be provided. Whilst I appreciate the concern of residents of the three cul-de-sacs to the east of the site, it may well be that one or more of these streets could be extended to serve as secondary access provision to the proposed development site without detriment to safety and amenity. This would depend on a detailed assessment of any proposed layout.

83. The council is aware of the need for supporting infrastructure to be available for development and is equally aware of the requirement to address safety, contamination and flooding issues. As previously indicated, none of these constraining elements is fundamental and all appear to be capable of resolution.

84. Similarly, as previously indicated, I do not believe that nature conservation matters warrant the non-allocation of the site.

85. I have carefully noted the claim that the proposed level of building would be out-of-keeping with the character of Crossford and that the peripheral location of the development would not relate well to the small commercial centre of the village. Many small settlements have been subject to growth over the years, often at peripheral locations. Indeed, although well-established, much of the village comprises relatively modern houses. Although impact on character through growth is often a matter of personal perception, I believe that a phased development of 200 houses would be unlikely to have a significant impact on the character of Crossford. A reasonable rate of development would allow both physical and social integration.

86. I accept that the peripheral nature of the development would place the new houses between 400 and 800 metres from the centre of the village but I believe this is not an unreasonable distance. On this basis, I consider that the existing commercial facilities could anticipate, at least, a marginal increase in customer base.

87. It is clear that, contrary to the concerns expressed, the site meets many of the tests to be passed in order to allow development. However, I must also consider the question of coalescence and landscape setting, crucial aspects in the assessment of suitability.

88. The open area between Crossford and Cairneyhill to the west is not designated green belt. This is understandable as the purpose of the green belt in this part of Fife is to protect the setting of Dunfermline. Nevertheless, the countryside between the two villages plays an important role in maintaining the setting and individual characters of Crossford and Cairneyhill. The loss of the proposed development site for housing would not bring about physical coalescence but, in my opinion, it would make a significant
incursion into the intervening countryside. The continued undeveloped nature of the land to the south side of the A994 would exacerbate the impact of the built-up extent of land to the north. Similarly, the upward slope of the land would give prominence to the development on the approach from Cairneyhill. Tree planting would take some time to start to offset this visual impact. I therefore share the opinion of those that argue the allocation of the land for development would lead to a detrimental impact on the landscape and adversely affect the setting of Crossford.

89. In turn, whilst the site meets most of the requirements to meet the definition of “effective” land, it fails in respect of land use. Housing is not a suitable land use for the site because of potential for significantly reducing the quality of the landscape setting of Crossford.

90. Alfred Stewart Property Foundation Ltd and Stewart Milne Homes Ltd argue that there is a strategic shortfall in housing land supply and that the site would make a contribution to achieving the objectives of SESplan. I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the 5-year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under Issue 2(b) Homes with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that this site would nevertheless be unacceptable because local considerations are also important and the adverse impacts identified above would outweigh the benefits of addressing any shortfall. I conclude that the site should not be allocated for residential development.

COUNTRYSIDE

Site LWD 010 Former British Telecom Depot, Crossford

91. The site is allocated as a protected employment area in the current local plan. It extends to some 4.2 hectares and is located in the strip of countryside, designated as green belt, between Crossford and the western boundary of Dunfermline. The buildings on the site give the general impression of poor quality. Those that are occupied provide accommodation for several small businesses including car repairs, joinery and printing uses. There is an extensive area of external caravan storage.

92. The proposed plan allocates the land for employment purposes requiring development to be of high quality design with boundary landscaping to complement the green belt location.

93. As argued by the Victoria Hillary Pension Fund, brownfield sites should be utilised before the allocation of greenfield locations. The representation envisages the site could accommodate a new community with “an appropriate range of facilities” and 80% mixed tenure housing along with home-working provision and “work/cycle space”. Victoria Hillary Pension Fund does not believe the proposal would lead to coalescence or precedent. Overall, it is argued, development of this nature would represent an improvement within the green belt.

94. Clearly, the site is an intrusion within the green belt, albeit of long standing. I also recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the 5-year effective housing land supply for the SESplan area of Fife. Similarly, I acknowledge the uncertainties expressed under issue 2(b) Homes with regard to the level of this shortfall. However, I cannot accept that part of the capacity of the Dunfermline North and West
housing land allocation should be transferred to this site. The green belt to the west of Dunfermline is small in extent but it has a clear purpose in protecting landscape setting and maintaining separation, in this instance between the town and Crossford.

95. I can accept that the development proposed would lead to an improvement in the quality of the built form. However, I agree with the terms of the report of the examination of the current local plan whereby it was concluded that development on the site as proposed would have the potential to create an impression that coalescence was starting to occur between Crossford and Dunfermline. Similarly, I believe implementation of the type of development proposed would be unable to take adequate account of the prominent green belt location of the site.

96. Although details have not been specified, I believe that the location of a “new community” within a sensitive area of green belt is not appropriate and the proposed plan should not be altered in this respect.

97. The council sees merit in the suggestions of the Scottish Environment Protection Agency in respect of flood risk assessment, a buffer strip and improving the water environment. Scottish Planning Policy states that the planning system should prevent development which would have a significant probability of being affected by flooding or which would increase the probability of flooding elsewhere. Scottish Planning Policy further states that the planning system should promote the protection and improvement of the water environment. Under the Water Environment and Water Services (Scotland) Act 2003, planning authorities have a duty to protect and improve Scotland’s water environment. I therefore consider it reasonable to include the need for an assessment and buffer strip as development requirements. Thereafter, design of development for the site should take into account the findings of the flood risk assessment. As recognised by the Agency, the text related to Policy 12, Flooding and the Water Environment, sets out the council’s position on the improvement of the water environment. Nevertheless, for the avoidance of doubt, the proposed plan should include a further reference under site LWD 010.

**Reporter’s recommendations:**

I recommend the following modifications be made:

1. On page 35, under reference CNH 002, Conscience Bridge (north), under “Status, additional development requirements, and other information”, delete:

   “Provision of a vehicular access to Glen Moriston Drive … linking with sites CNH 004, CNH 005 and CNH 006.”

and replace with:

   “Any further access requirements and the vehicular and pedestrian relationship between this site and sites CNH 004, CNH 005 and CNH 006 shall be determined through the master plan process.”
2. On page 36, under reference CNH 005, Land north of Cairneyhill, amend the site area from “5.3” hectares to “17” hectares and under “Status, additional development requirements, and other information”, under the first bullet point commencing “The existing Pitdinnie Road/A994 junction …” delete:

“to a signal controlled junction with pedestrian stages,” and “Fife Council will require a 10 year commuted sum for maintenance of the traffic signal junction.”

3. On page 53, under reference CRF 001, Keavil Farm/Nursery, insert under “Status, additional development requirements, and other information”:

“Attention is drawn to ancient woodland adjacent to the site. In the event of any development being proposed, it is likely that a protective strip will be required, the extent of which should be determined following a detailed tree survey.”

Note: there appears to be a typographical error in the text of the proposed plan under reference CRF 001.

4. On page 184, under reference LWD 010, Former British Telecom Depot, Crossford, include the following as development requirements:

“A flood risk assessment is required. Design of development must take account of the findings of the flood risk assessment. An appropriate buffer strip between the built development and the adjacent watercourse is necessary. The Scottish Environment Protection Agency has recommended a feasibility study to assess the potential for restoration and improvement of the water environment.”
<table>
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<th>Issue 7a(1)</th>
<th>Dunfermline &amp; Halbeath – Allocated Sites/Other Proposals (Non SDA)</th>
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**Body or person(s) submitting a representation raising the issue (including reference number):**

- **DUNFERMLINE & HALBEATH – ALLOCATED SITES/OTHER PROPOSAL (NON SDA)**
  - DUN 003 Beveridge House SEPA (3351)
  - DUN 005 East Dunfermline North (C) SEPA (3352)
  - DUN 009 Kingdom Gateway (G) SEPA (3354)
  - DUN 011 Kingdom Gateway (EF2) SEPA (3355)
  - DUN 012 Kingdom Gateway (EF3) SEPA (3358)
  - DUN 014 Kingdom Gateway (EF4) SEPA (3359)
  - DUN 017 East Dunfermline (North B) SEPA (3362)
  - DUN 018 Kingdom Gateway (HI) SEPA (3364)

- **DUN 024 Blacklaw Road SEPA (3365)**

- **DUN 052 Calais Muir (Central)** SEPA (3383)
- **DUN 053 Calais Muir (South)** SEPA (3385)
- **DUN 055 Pitreavie Drive** SEPA (3386)
- **DUN 057 Pitreavie Way** SEPA (3387)
- **DUN 059 Halbeath Interchange** The Woodland Trust Scotland (2887) SEPA (3388)
- **DUN 060 South of Elliot Street** Heather McDonald (64) SEPA (3389)
- **DUN 066 Charlestown Rail Junction, Dunfermline**
  - Transport Scotland (3219)
- **DUN 067 Northern Link Road**
  - Ronnie Cowan (249)
  - Fiona McGregor (266)
  - Raymond Pringle (486)
  - Linda Cowan (625)
  - Margaret Provan (656)
  - Maria Smeaton (670)
  - Syme (732)
  - William McCulloch (767)
  - Bellyeoman Community Council (781)
<table>
<thead>
<tr>
<th>Reference</th>
<th>Name and Contact Information</th>
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<tbody>
<tr>
<td>DUN 029 (a and b) Lynebank Hospital</td>
<td>Michael Kidd (386) Sheila Provan (1134) Martin Moody (2064) NHS Fife (3843)</td>
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<tr>
<td>DUN 030 Land at Masterton (west of Masterton Road)</td>
<td>SEPA (3253)</td>
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<td>DUN 031 (Paton Street North)</td>
<td>Andrew Thomson (2030)</td>
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<td>DUN 036 (Elliot Street)</td>
<td>Sean Condie (12) William McGurk (50) Heather McDonald (63) Beard (379) Ruth Cross (701) Moira Hutton (938) Stephen Pumphrey (1573) C Campbell (1747) SEPA (3368)</td>
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<td>DUN 037 Dover Heights</td>
<td>Scottish Enterprise (1054) SEPA (3369)</td>
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<td>DUN 050 Elgin Street 1E</td>
<td>SEPA (3381)</td>
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<td>DUN 051 Axis Point</td>
<td>The Woodland Trust Scotland (2882) Diarmuid O’Connor (SEPA) (3382) SEPA (3382)</td>
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<td>DUN 068 Western Distributor</td>
<td>SEPA (3392)</td>
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<td>DUN 069 Bothwell Gardens Roundabout</td>
<td>SEPA (3394)</td>
</tr>
<tr>
<td>DUN 070 Pitreavie Roundabout</td>
<td>Tim Stanford (931) SEPA (3395)</td>
</tr>
<tr>
<td>DUN 072 City Square, Dunfermline Town Centre</td>
<td>SEPA (3396)</td>
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**Provision of the development plan to which the issue relates:**
Settlement Plan: Dunfermline – Allocated sites and Other Proposals (Non SDA)

**Planning authority’s summary of the representation(s):**

DUN 003 Beveridge House

DUN 005 East Dunfermline North (C)

DUN 009 Kingdom Gateway (G)
SEPA (3354): Support Development Requirement for Flood Risk Assessment should the existing planning permission lapse.

DUN 011 Kingdom Gateway (EF2)

DUN 012 Kingdom Gateway (EF3)

DUN 014 Kingdom Gateway (EF4)
SEPA (3359): Support Site Requirement for a buffer strip along the watercourse.

DUN 017 East Dunfermline (North B)
SEPA (3362): Support Development Requirements for Flood Risk Assessment and a buffer strip along the watercourse.

DUN 018 Kingdom Gateway (HI)
SEPA (3364): Support Development Requirement for Flood Risk Assessment should the existing planning permission lapse.

DUN 024 Blacklaw Road
SEPA (3365): Support Development Requirements for Flood Risk Assessment, buffer strip along the watercourse and feasibility study to enable consideration of the potential for restoration and improvement of the water environment through the site design.

DUN 029 (a and b) Lynebank Hospital
Sheila Provan (1134) Object to the proposal.

Michael Kidd (386), Martin Moody (2064): Object to the proposal in terms of potential negative impacts on the environment, existing surrounding communities and properties, referring to:

- amenities;
- overload on infrastructure;
- noise and pollution;
- disturbance;
- flooding; and,
- traffic and access.
There is little clarity regarding:

- site capacity and details of proposed houses;
- proposed road improvements/maintenance and related funding;
- evidence of traffic flow behaviour; and,
- noise and air quality impacts.

Michael Kidd (386): Given the massive eastern expansion programme to the south/east of this location it is questionable why the level of development sites in the Halbeath area is required.

NHS Fife (3843): Amendment required to the boundary profile of both areas of land for sale to ensure the provision of sensitive clinical care is maintained at the hospital site.

**DUN 030 Land at Masterton (west of Masterton Road)**

SEPA (3253): The site is located in or adjacent to the functional flood plain or an area of known flood risk and part of the site may not be suitable for development. A Flood Risk Assessment is required to assess the risk from the small watercourse which flows through the site.

**DUN 031 Paton Street North**

Iain Thomson (2030): Objects to proposal noting concern about number of houses for the area and the height of the houses in the development.

**DUN 036 Elliot Street**

Sean Condie (12), William McGurk (50), Heather McDonald (63), Beard (379), Ruth Cross (701), Moira Hutton (938), Stephen Pumphrey (1573), C Campbell (1747): All object to DUN 036 with comments including:

- Open/green space valued for recreational use and wildlife habitat will be lost. The site is listed on Scottish Natural Heritage’s ‘National Greenspace’ website as a ‘residential amenity’ and in the Fife Council plan is an ‘existing Green Network asset’.
- The proposal will block light into properties, and drying green on Elliot Hill Street, and affect privacy.
- Congestion, parking difficulties and traffic noise will be worsened by further development, with residential parking in the street already using the pavement.
- The proposal breaches several of the points in Policy 10 – Amenity and currently provides a buffer between housing and proposal DUN060 South of Elliot Street for employment.
- It is questionable how local schools and medical facilities could support the 19 units.
- Providing this ‘affordable’ housing in one of most affordable areas in Dunfermline does not follow affordable housing policy to ‘achieve mixed and balanced communities’.
- Property values for owners in surrounding streets will be ruined and make resale difficult.
- The foundations and structure of existing buildings might be affected by changes to the ground brought about by building activity.
- There are 4-5 more suitable plots in the area that are either fenced off or brownfield.
The Plan contains very little detail of what will be built or details of parking.
The previous proposal to develop the site was considered unsuitable for housing by the Reporter.


DUN 037 Dover Heights
Scottish Enterprise (1054): Support the allocation of this site for housing, with employment, community and leisure uses.
SEPA (3369): Support Development Requirements for a buffer strip along the watercourse and feasibility study to enable consideration of the potential for restoration and improvement of the water environment through the site design.

DUN 050 Elgin Street 1E

DUN 051 Axis Point
The Woodland Trust Scotland (2882): Object to the site being identified for development as this will lead to the loss of, and damage to, adjacent ancient woodland (Calais Muir Wood). The allocation should not be taken forward unless the protection of the adjacent ancient woodland can be guaranteed with sufficient buffering between proposed development and woodland identified in planning policy at the appropriate stage. Recommend that if any protected species are present on, or adjacent to, site then appropriate survey work should be carried out to determine the impact of development on the populations.

DUN 052 Calais Muir (Central)
SEPA (3383): Support Development Requirements for Flood Risk Assessment and a buffer strip along the watercourse.

DUN 053 Calais Muir (South)
SEPA (3385): Support Development Requirements for Flood Risk Assessment and a buffer strip along the watercourse.

DUN 055 Pitreavie Drive

DUN 057 Pitreavie Way
SEPA (3387): Support Development Requirements for Flood Risk Assessment, buffer strip along the watercourse and feasibility study to enable consideration of the potential for restoration and improvement of the water environment through the site design.
DUN 059 Halbeath Interchange

The Woodland Trust Scotland (2887): Object to the site being identified for development as this will lead to the loss of, and damage to, adjacent ancient woodland (Calais Muir Wood). The allocation should not be taken forward unless the protection of the adjacent ancient woodland can be guaranteed with sufficient buffering between proposed development and woodland identified in planning policy at the appropriate stage. Recommend that if any protected species are present on, or adjacent to, site then appropriate survey work should be carried out to determine the impact of development on the populations.

SEPA (3388): Support Development Requirements for Flood Risk Assessment, buffer strip along the watercourse and feasibility study to enable consideration of the potential for restoration and improvement of the water environment through the site design.

DUN 060 South of Elliot Street

Heather McDonald (64): It is unclear what is proposed as there is no detailed plan. Additional traffic up and down Millhill Street will have safety impacts for pets and children and impacts on parking. Traffic and noise in the area has been reduced since an exit from Asda was blocked and this proposal will cancel this benefit. Appreciate nice outlook from home in Millhill Street and do not want this ruined with related impact on property value if based close to industrial storage area.

SEPA (3389): Support Development Requirements for Flood Risk Assessment, buffer strip along the watercourse and feasibility study to enable consideration of the potential for restoration and improvement of the water environment through the site design.

DUN 066 Charlestown Rail Junction, Dunfermline

Transport Scotland (3219): Agreement has not been reached with Transport Scotland on the inclusion of this proposal in the Plan. A robust, multi modal appraisal has not been sufficiently undertaken to determine this is the best transport solution. A business case has not been produced, or initiated, to show a rail line is financially viable or deliverable. The representation makes reference to Transport Scotland’s responsibility for the development of the rail network in Scotland, the Scottish Government’s Strategic Transport Projects Review and Scottish Planning Policy (SPP). Reference is made to SPP para 274 and 277 relating to Transport (CD1 pages 62 and 63), to Scottish Transport Appraisal Guidance (STAG) and to the Network Rail ‘Investment in Stations’ Guidance (2011). A STAG based study was carried out by SEStran in 2010 which included an appraisal of rail options for the Edinburgh-Alloa corridor but Transport Scotland was not effectively engaged in the preparation of this study and does not support its conclusions. Any future services on this line should be clearly established through a STAG Appraisal. The lack of train paths from Charlestown Junction into Edinburgh and wider operational constraints on the network renders services from Alloa to Edinburgh via the Forth Bridge undeliverable.

DUN 067 Northern Link Road

Ronnie Cowan (249), Fiona McGregor (266), Raymond Pringle (486), Linda Cowan (625), Maria Smeaton (670), Margaret Provan (656), Syme (732), William McCulloch (767), Roger P Oliver (784), Christine Oliver (818), Linda Ferris (948), Christopher
PROPOSED FIFE LOCAL DEVELOPMENT PLAN

McCallum (1240), Jacqueline Young (1405), Gemma Nicholson (1294), David Fyffe (1933), William Henderson (1603), Joan Cameron (2016), David Croft (3902): All object to the proposal, specifically the route of the proposal in relation to Townhill and Townhill Country Park, making a range of comments:

- Serious effect on the lives of people who live along the proposed route in Townhill, with huge loss of amenity, including in terms of privacy, noise and pollution, both during construction and in terms of lasting impact.
- Will ruin peaceful character and rural aspect of Townhill and the area, appearance and enjoyment of the countryside, enjoyment of Townhill Country Park and its close link with the village.
- Route runs through Townhill Country Park with detrimental impact on wildlife and natural environment and leisure activities within the park including loss of walking and cycling paths used by many people from Townhill and wider Dunfermline area (disregards Fife Council statements regarding protection and management of Fife’s natural heritage, Bikeability Initiative, and Health & Wellbeing Plan).
- The village is currently free from busy traffic.
- Road drawn up without idea of how this might affect the environment and safety of Townhill’s residents and more work needed to ensure a route is found that does not have a major impact on Townhill residents and the environment of the Country Park.
- There are mine workings in the area and question whether this has been taken into account.
- The proposed route is fraught with technical issues.
- Upgrade of existing routes would be better solution.
- There will be a detrimental impact on house value.

Maria Smeaton (670), Linda Ferris (948), Janek Matysiak (1498), S Baxter (1643): All object to the proposal, making general comments (other than in relation to Townhill and Townhill Country Park):

- Careful planning needed to integrate new roads around green spaces, not through them.
- The proposal should include more detail before it is considered further, including answering questions such as how the road will connect into the Halbeath interchange.
- Will bring a huge amount of traffic and pollution through a populated area where the roads already struggle to cope.
- Loss of green belt and agricultural land contradicting Fife Council policy “to maintain and protect Fife’s resource of prime agricultural land”.
- Will bring more traffic and congestion to the west side of Dunfermline.
- There will be the loss of green areas with high amenity value, noting areas adjacent to East Baldridge Drive and West Baldridge Road.

Raymond Pringle (486), William McCulloch (767), Bellyeoman Community Council (781): The road appears to depend on section 75 agreements and concern that this will not ensure that the road is completed in advance of housing development. Question what will happen if developments do not proceed or phasing is over a lengthier timescale.

Bellyeoman Community Council (781): FIFEplan has not addressed concerns about the Northern Relief Road and provides little detail on the road. Following community consultation the Community Council have produced a map (see supporting document)
with a suggestion of a Northern Relief Road that would serve the increase in homes and cars, safeguards Townhill and Kingseat from becoming rat-runs, avoids the congestion that would result if the Northern Relief road fed into the Halbeath Road corridor and would allow for further development in the area.

Raymond Pringle (486), William McCulloch (767), Bellyeoman Community Council (781), Christopher McCallum (1240), Hugh Johnston (1248), Rose Johnston (1252), David Kerr (2621), David Croft (3902): All object to the proposal and make specific comments on the location of current road congestion:

- This appears to be the only considered solution to cope with increased traffic through development sites across the north of Dunfermline and wider and is an optimistic assessment. Little regard has been given to increase on feeder roads from the north to shopping centres, town centres and work places in Dunfermline and the link road will not answer traffic congestion on already busy feeder roads. The route may benefit those travelling across the North of Dunfermline (avoiding the city centre) but will not help those wishing to use local feeder roads for shopping, work and leisure. FIFEplan does not put forward any detailed plans or solutions to address the inevitable increase in traffic on already busy Whitefield Road and Townhill Road.
- Road traffic congestion, at peak periods, causes ‘gridlock’ with traffic backing up Kingseat Road and Halbeath Road and beyond – due to the existing road being shut at the railway level crossing.
- Location of railway crossing of concern as where this road will exit into Halbeath onto Kingseat Road is already hugely congested at peak times with traffic entering and exiting Dunfermline. The junction at Lady Nairne Road and East Baldridge Drive has a road safety and capacity issues with both roads having a higher level of traffic flow than their original design intended. The scope to alter the junction is limited. A major increase in traffic flow (from both Lady Nairne Drive and East Baldridge Drive, construction and commuting) at peak commuting times brought together at an unsafe junction with poor visibility and an inflexible natural geometry, will greatly increase the likelihood of accidents for all commuters and road users. The proposal to utilise East Baldridge Drive or Lady Nairne Road to access a new primary school will not result in creating a “safe route to School.”
- Feeder roads like Whitefield Road, Townhill Road and Halbeath Road are already busy.
- The additional traffic on Townhill Road and A823 (Pilmuir Street) during construction and long term during the morning/afternoon school runs and weekends will add traffic to roads which are already overcrowded. The junction of Townhill Road/Kinseat Road/Chamberfield Road with limited visibility is already dangerous and additional traffic will increase frequency and severity of accidents.
- The impact of protracted road works would delay traffic, increase pollution and increase the risk of accidents

David Fyffe (1933), Margaret Provan (656), David Croft (3902), Ronnie Cowan (249), Raymond Pringle (486), Roger P Oliver (784): All make suggestions for upgrading of existing routes or alternative routes:

- Development could be better by a route by the A823 and B914 to Junction 4 at the M90, giving better access to the motorway for through traffic. A road from Halbeath to Kingseat Road/Whitefield Road junction could be constructed to serve the Wester Whitefield development (DUN043 Halbeath).
- Enhance current north route from Wellwood to Halbeath (via A823, Lathalmond to the M90).
- A southern relief road, linking the roundabout at Cairneyhill to the Rosyth/Sky roundabout (partly the existing A985) would remove through traffic from both Dunfermline and Rosyth and spread the load between this road and the northern one.
- Route to go the north of Townhill and bypassing the village, Country Park and woods.
- Connect to M90 between Halbeath and Kelty at least one kilometre north of proposal
- Upgrade of existing roads to north of Dunfermline.

Christine Johnston (1245), Hugh Johnston (1248), Rose Johnston (1252): All object to proposal DUN 067 Northern Link Road in relation to the Lady Nairne Road area of Dunfermline:

- Object to any proposal to extend Lady Nairne road (DUN067 Northern Link Road) based on observation of current and proposed Fife Council planning policy, Scottish Planning Policy, Planning Advice Notes and other guidelines. Reference is made to Scottish Planning Policy (CD 1) Core Principles and that maintaining this proposal in the development plan will undermine the modernised planning system and its objectives. The local authority has abandoned its responsibility to protect local communities and part of the mitigation measures to clear negative effects of the northern Strategic Development Area should be the exclusion from the proposed plan of Lady Nairne Road within DUN 067 Northern Link Road as a vehicular access to DUN035 Dunfermline N/W/SW.
- The land at the head of Lady Nairne Road is referred to as protected open space under existing Fife planning policy. This proposal indicates two road links to the northern Strategic Development Area through this well used community resource. Any proposal to extend Lady Nairne road will result in existing open space and the wider green network being segmented by two busy commuter routes, limiting access, reducing the usability of the public open space.
- In order to integrate existing and the proposed new communities, the existing public open space should be maintained and green buffer zones extended to form a link between communities. Other suitable alternatives exist that will not impact the local community to the same negative degree. It would also help safeguard local amenities, public open space and the biodiversity of the area.
- The land to the north of Lady Nairne Road has a well-documented history of coal mining. Ground stabilisation will be required due to former mine working and there will be detrimental impacts from the release of contaminated mine water.
- There will be the loss of green areas with high amenity value, in particular the areas adjacent to East Baldridge Drive and West Baldridge Road.

Royal London Asset Management (2261): Object to indicative line of proposal stating that there is no justification within the plan for the choice of line which does not link to a public road but to a private service access road serving a long established retail park at Halbeath. There has been no discussion with retail park owners. There should be an explanation of how the line has been chosen. It is disappointing that the Council, if suggesting that the north extension of Dunfermline for housing is an important way to achieve SEPlann housing land targets, has not sought to engage with all relevant land owners. The road, proposed housing and support required for expansion of services such as retailing at Halbeath should all be considered and a road line should not be promoted without willing land owners. This calls into question the effectiveness and
timing of the housing land and further, whether the Council’s land allocations are viable and deliverable.

SEPA (3390): Support Development Requirements for Flood Risk Assessment, buffer strip along the watercourse and feasibility study to enable consideration of the potential for restoration and improvement of the water environment through the site design.

David Croft (3902): Objects to Proposal DUN067 Northern Link Road on the following grounds:

- The development would encroach on Townhill Country Park, impacting on leisure activities in the park and the adjoining golf course and reducing the attractiveness of the park to visitors.
- Impacts of increased traffic (including construction traffic) creating noise, congestion, air pollution and increased risk of accidents.
- Adverse impact on wildlife.
- The proposal would remove the country walk and cycleway along the disused railway line.

Development on Proposal DUN067 Northern Link Road along with Proposals DUN038 Kent Street, DUN039 North Dunfermline (Colton), DUN044 Land to the north of Wellwood, DUN46 Chamberfield Road, TWH001 Townhill Power Station Site and TWH002 Townhill Loch Car Park would largely enclose the country park impacting the wildlife in the park. Development on proposal DUN043 Halbeath would further reduce wildlife access to the country park. Suggests rerouting proposal DUN067 Northern Link Road at least 1km to the north connecting to the M90 between Halbeath and Kelty.

DUN 68 Western Distributor

SEPA (3392): Support Development Requirements for Flood Risk Assessment, buffer strip along the watercourse and feasibility study to enable consideration of the potential for restoration and improvement of the water environment through the site design.

DUN 069 Bothwell Gardens Roundabout


DUN 070 Pitreavie Roundabout

Tim Stanford (931): Safe pedestrian crossing needed at A823 (M) crossings as part of enhancement to roundabout. Notes that Facebook page (A823MCrossings) contains photo evidence of problems crossing road.


DUN 072 City Square, Dunfermline Town Centre

SEPA (3396): Support Development Requirements for Flood Risk Assessment, buffer strip along the watercourse and feasibility study to enable consideration of the potential for restoration and improvement of the water environment through the site design.
## Modifications sought by those submitting representations:

### DUN 029 (a and b) Lynebank Hospital

Sheila Provan (1134), Michael Kidd (386), Martin Moody (2064): Delete proposal DUN 029 (a and b) from the Proposed Plan.

NHS Fife (3843): Amend boundary profile of DUN 029 (a and b)

### DUN 030 Land at Masterton (west of Masterton Road)

SEPA (3253): A Flood Risk Assessment (FRA) should be included as a site specific development requirement.

### DUN 031 Paton Street North

Iain Thomson (2030): Delete/amend proposal.

### DUN 036 Elliot Street

Sean Condie (12), William McGurk (50), Heather McDonald (63), Beard (379), Ruth Cross (701), Moira Hutton (938), Stephen Pomphrey (1573), C Campbell (1747): Delete proposal DUN 036 from the Proposed Plan.

### DUN 051 Axis Point

The Woodland Trust Scotland (2882): Delete proposal DUN 051 from the Proposed Plan or, otherwise, ensure the protection of the adjacent ancient woodland (Calais Muir Wood) with sufficient buffering identified between the proposed development and woodland.

### DUN 059 Halbeath Interchange

The Woodland Trust Scotland (2887): Remove proposal DUN 059 from the Proposed Plan or, otherwise, ensure the protection of the adjacent ancient woodland (Calais Muir Wood) with sufficient buffering identified between the proposed development and woodland.

### DUN 060 South of Elliot Street

Heather McDonald (64): Delete proposal DUN 060 from the Proposed Plan.

### DUN 066 Charlestown Rail Junction, Dunfermline

Transport Scotland (3219): Delete proposal DUN 066 from the Proposed Plan.

### DUN 067 Northern Link Road

Ronnie Cowan (249), Fiona McGregor (266), Raymond Pringle (486), Linda Cowan (625), Margaret Provan (656), Syme (732), William McCulloch (767), Roger P Oliver (784), Christine Oliver (818), Linda Ferris (948), Christopher McCallum (1240), Jacqueline Young (1405), Gemma Nicholson (1294), David Fyffe (1933), William...
Henderson (1603), Joan Cameron (2016), David Croft (3902), Maria Smeaton (670), Janek Matysiak (1498), S Baxter (1643), Bellyeoman Community Council (781), Hugh Johnston (1248), Rose Johnston (1252), David Kerr (2621), Christine Johnston (1245), Royal London Asset Management (2261): Delete the indicative road line DUN 067 Northern Link Road from the Proposed Plan.

Bellyeoman Community Council (781): identify the alternative route for the Northern Relief Road (see SD1)

David Croft (3902): Reroute proposal DUN067 at least 1km to the north connecting to the M90 between Halbeath and Kelty

DUN 070 Pitreavie Roundabout

Tim Stanford (931): Ensure safe pedestrian crossing as part of roundabout enhancement.

**Summary of responses (including reasons) by planning authority:**

Note: Where a number of representations were received to sites a conjoined response has been prepared covering the various issues raised within the individual representations.

**DUN 029 (a and b) Lynebank Hospital**

Fife Council has a statutory duty to ensure that the FIFEplan Local Development Plan (LDP) conforms to the SESplan Strategic Development Plan before it can be adopted. The Council must maintain at least a 5 year effective housing land supply in the Dunfermline & West Fife Housing Market Area, and the Local Development Plan should identify sufficient sites to meet the housing land requirement for 10 years as detailed in the SESplan Strategic Development Plan.

Supplementary guidance for housing land in the SESplan area determines the scale of the housing requirements to be met in the SESplan area through new housing land allocations in the Local Development Plan for the period up to 2026 (see Issue 2b Homes Schedule 4 and supporting housing paper).

Allocating a generous supply of land for housing across the Housing Market Areas in the Local Development Plan gives the flexibility necessary for the continued delivery of new housing should unpredictable changes to the effective housing land supply occur during the lifetime of the Local Development Plan. Development of this site is consistent with the SESplan strategy. The site could contribute an estimated 200 houses towards meeting the housing land requirement and reuses previously developed land, in line with Scottish Planning Policy (2014) (CD1).

Issues relating to the amenity of existing residents such as noise, nuisance, smell, privacy, daylight etc. would be addressed at the detailed planning application stage. In this event, Local Development Plan policies 1: Development Principles (CD5 pages 191 – 192) and policy 10: Amenity (CD5 pages 229 – 230), will help to protect existing amenity and assist the decision making process on planning applications.
Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision. Detailed matters, such as the specifications of road access and drainage arrangements for example, will be dealt with at planning application stage. Individual proposals will be subject to traffic assessments which will identify measures and interventions required to make development proposals acceptable in terms of traffic impact.

A Strategic Transport Assessment (STA) is being commissioned to look at wider impacts on the trunk road network. The STA has been arranged in discussion with Transport Scotland and with input from Transportation and Environmental Services. It is expected that the information from this will inform development obligations and should be available ahead of the Plan Examination in 2015.

A Development Requirement for this site is that a masterplan should be prepared by the developers and/or landowners for the hospital complex as a whole, for approval by Fife Council. Access proposals for sites (a) and (b) should be considered at the same time as part of the master planning process. This master planning process will provide greater clarity relating to proposals for the site and the boundary of proposed development within this, in terms of ensuring sensitive clinical care is maintained at the hospital site.

DUN 030 Land at Masterton (west of Masterton Road)

The proposed Plan’s policies 1 (Development Principles) (CD5 pages 191 – 192) and 12 (Flooding and the Water Environment) (CD5 pages 237 – 239) set out adequate policy coverage to ensure a Flood Risk Assessment is required at the planning application stage for any development located in or adjacent to the functional flood plain or an area of known flood risk, compliant with Scottish Planning Policy.

Fife Council considers that there is merit in the reference to a requirement for Flood Risk Assessment being included in the ‘development requirements’ for DUN 030 in the Dunfermline Settlement Plan (using the text ‘A Flood Risk Assessment requires to be undertaken prior to development on this site’, and invites the Reporter to make an appropriate recommendation on this issue.

DUN 031 Paton Street North

Fife Council has a statutory duty to ensure that the FIFEplan Local Development Plan (LDP) conforms to the SESplan Strategic Development Plan before it can be adopted. The Council must maintain at least a 5 year effective housing land supply in the Dunfermline & West Fife Housing Market Area, and the Local Development Plan should identify sufficient sites to meet the housing land requirement for 10 years as detailed in the SESplan Strategic Development Plan.

Supplementary guidance for housing land in the SESplan area determines the scale of the housing requirements to be met in the SESplan area through new housing land allocations in the Local Development Plan for the period up to 2026(see Issue 2b Homes Schedule 4).
Allocating a generous supply of land for housing across the Housing Market Areas in the Local Development Plan gives the flexibility necessary for the continued delivery of new housing should unpredictable changes to the effective housing land supply occur during the lifetime of the Local Development Plan. Development of this site is consistent with the SESplan strategy. The development of this site reuses previously developed land, in line with Scottish Planning Policy (2014) (CD1) and its preferred use is for housing. The site could contribute an estimated 30 houses towards meeting the housing land requirement.

The design of the proposal, including site layout and number of houses would be progressed at the planning application stage. Local Development Plan policies 1: Development Principles, 5: Employment Land and Property, 10: Amenity and 14: Built and Historic Environment will assist the decision making process on planning applications by protecting existing amenity and ensuring that development proposals meet the ‘six qualities’ of well-designed and successful places as set out in Scottish Planning Policy (2014) (CD1 pages 13-14)

DUN 036 Elliot Street

Fife Council has a statutory duty to ensure that the FIFEplan Local Development Plan (LDP) conforms to the SESplan Strategic Development Plan before it can be adopted. The Council must maintain at least a 5 year effective housing land supply in the Dunfermline & West Fife Housing Market Area, and the Local Development Plan should identify sufficient sites to meet the housing land requirement for 10 years as detailed in the SESplan Strategic Development Plan.

Supplementary guidance for housing land in the SESplan area determines the scale of the housing requirements to be met in the SESplan area through new housing land allocations in the Local Development Plan for the period up to 2026(see Issue 2b Homes Schedule 4)

Allocating a generous supply of land for housing across the Housing Market Areas in the Local Development Plan gives the flexibility necessary for the continued delivery of new housing should unpredictable changes to the effective housing land supply occur during the lifetime of the Local Development Plan. This site is close to local services and Dunfermline town centre and would integrate well with the local area. Development of this site is consistent with the SESplan strategy.

The site was previously considered as part of the Dunfermline and West Fife local plan in 2011. At that time the reporter considered the site to be non-effective due to site constraints. They noted in particular the need to divert services on the site, the cost of which had proved prohibitive in the past and that the site was not in a marketing programme (see CD21 page 247 – 248 paragraph 13). These constraints have now been resolved and the site has therefore been identified in the proposed LDP (See SD2, Note from Housing and Neighbourhood Services pages 3-4)

Impact on Open/Green Space

It is acknowledged that development of the site will lead to loss of green space (this site area being 0.5ha) within the wider Lyne Burn Green Network, which includes Rex Park, to the east. However, Local Development Plan policies 1: Development Principles, 10: Amenity and 14: Built and Historic Environment and Fife Council’s Draft Supplementary
Guidance on Design will ensure that proposed development meets the ‘six qualities’ of well-designed and successful places as set out in the Scottish Government’s Designing Places policy. A priority for the development of this site should be to ensure that the proposal has a high quality landscape edge, particularly to the east and south, and that the site layout and landscaping maintains and enhances the wider connectivity with the Lyne Burn Green Network.

Other proposals in the Proposed Local Development Plan have stated Green Network Priorities, although this is omitted from the Proposal DUN 036 in the Dunfermline Settlement Plan. Consistent presentation of Green Network Priorities would be beneficial to the presentation of the Plan and provide an early alert to a future developer.

Taking all of this into account, Fife Council considers that there is merit in the reference to a requirement for Green Network Priorities being included in the ‘development requirements’ for DUN 036 (in the Dunfermline Settlement Plan) using the text below and invites the Reporter to make an appropriate recommendation on this issue.

‘Green Network Priorities for this site are:

- Develop a new high quality development frontage and landscape edge on to the wider Lyne Burn Green Network (particularly the southern and eastern boundaries) and maintaining existing green network connections.

Impact on Infrastructure – Schools and Medical facilities

Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies in infrastructure have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be “on-demand” provision or upgrades to existing provision, for example, new schools.

Impact of development on property value

Property value is not a material planning consideration.

Local amenity, design, traffic and other detailed site specific matters

Issues relating to the amenity of existing residents such as noise, nuisance, smell, privacy, daylight etc. would be addressed at the planning application stage. This stage would also include further details of a proposal, including traffic management, road access, parking and any site investigations required, including ground stability. The assessment of this site indicates that satisfactory parking and access arrangements are achievable and could improve existing parking conditions in the area. The design of the proposal, including site layout and number of houses would be progressed at the planning application stage. Local Development Plan policies 1: Development Principles, 10: Amenity and 14: Built and Historic Environment will assist the decision making process on planning applications by protecting existing amenity and ensuring that development proposals meet the ‘six qualities’ of well-designed and successful places as set out in Scottish Planning Policy (2014) (See CD 1 pages 13-14).
Proposed Affordable Housing

As required by Scottish Planning Policy (2014) (see CD1 paragraph 110 page 27) Fife Council is required to identify a generous supply of land for the Dunfermline & West Fife Housing Market Area to support the housing land requirement across all tenures. This site, in Fife Council ownership, presents an opportunity to support the provision of affordable housing to meet need within this Housing Market Area. It is not considered that the location of affordable housing on this site would be detrimental to achieving a ‘mixed and balanced community’ given its relatively small scale development potential.

Alternative Sites

Fife Council is required by Scottish Planning Policy (2014) (see CD1 paragraph 110 page 27) to identify a generous supply of land for the Dunfermline & West Fife Housing Market Area to support the housing land requirement across all tenures. All areas of land within Dunfermline, including brownfield sites, promoted by a developer/landowner during the preparation of the Proposed Plan, have been assessed. Only sites which have shown that they are effective, in line with the criteria in Planning Advice Note 2/2010, are included within the Plan. Otherwise, without allocation in the Plan, proposed Plan Policy 1: Development Principles (see CD5 pages 191 – 192) would support the principle of development on a site within the settlement boundary subject to compliance with other relevant proposed Plan policies.

DUN 051 Axis Point & DUN059 Halbeath Interchange

The adjacent woodland (Calais Muir Wood) is identified within the Proposed Plan as an ‘Existing Green Network Asset’. Proposed Plan policies 1: Development Principles and 13: Natural Environment and Access set out adequate policy coverage to ensure that at the planning application stage the adjacent ancient woodland is protected.

However, a buffer zone adjacent to areas of woodland to mitigate against potentially adverse impacts of development has been included in the development requirements for other Proposals in the Plan, further to earlier comments from the Woodland Trust. The site assessments on biodiversity carried out for FIFEplan identified requirements for 10m buffer zones as sufficient protection.

Fife Council considers that there is merit in the reference to a requirement for a buffer being included in the ‘development requirements’ for DUN 051 and DUN 059 in the Dunfermline Settlement Plan, using the text below, and invites the Reporter to make an appropriate recommendation on this issue.

‘No development should be within 10m of woodland and field boundary trees’.

DUN 060 South of Elliot Street

Employment land supply and distribution is a core part of the FIFEplan spatial strategy as is the reuse or redevelopment of brownfield land, before proposing development on greenfield sites, in line with Scottish Planning Policy (2014) (see CD1 paragraph 40 page 13 and CD5 paragraph 29 page 14). This brownfield site contributes to the range of sites identified in the Proposed plan to provide a sufficient employment land supply across Fife. The area surrounding the site is a mix of uses, including housing, and any future planning application for the site would require to take account of these uses.
Issues relating to the amenity of existing residents such as noise, nuisance, smell, privacy, daylight etc. would be addressed at the planning application stage. This stage would also include further details of a proposal, including traffic management, road access and parking. The design of the proposal, including site layout and number of houses would be progressed at the planning application stage. Local Development Plan policies 1: Development Principles, 5: Employment Land and Property, 10: Amenity and 14: Built and Historic Environment will assist the decision making process on planning applications by protecting existing amenity and ensuring that development proposals meet the ‘six qualities’ of well-designed and successful places as set out in Scottish Planning Policy (2014) (CD1 pages13-14). The Settlement Plan text for the site DUN 060 includes that the development will be ‘adequately separated from adjoining uses’.

**Impact of development on property value**

Property value is not a material planning consideration.

**DUN 066 Charlestown Rail Junction, Dunfermline**

The Dunfermline Settlement Plan text for proposal DUN 066 states that Fife Council is the Lead Agency for this proposal and that Transport Scotland requires to be consulted on the proposal. It is considered appropriate that the proposal, as a component of the Local Development Plan’s spatial strategy aimed at improving rail connectivity, remains in the Local Development Plan, with the above text references.

**DUN 067 Northern Link Road**

SESplan (see CD2, page 8) directs further development to the north of the city, so land has been identified in line with those requirements. In the north-west the new sites add to the existing proposals identified in earlier development plans and, in the north east a new allocation is identified at Halbeath. The provision of a Northern Link Road (and Western Distributor) is essential to the delivery of these strategic developments.

**Proposed alignment of Northern Link Road (DUN 067)**

With regard to the proposed alignment of the Northern Link Road (NLR), shown in the proposed FIFEplan, the following principles were applied:

- provide the NLR within the proposed allocated site, with the works funded directly by the developer;
- provide the NLR within Council owned land, with the works funded via the transport fund;
- avoid third party ownership, as far as practically possible,
- avoid difficult engineering – the use of Council owned former mineral railway lines are ideal as the longitudinal gradient tends to be no greater than 1 in 50,
- and provide a route that is an attractive alternative route to existing routes; results in no increase or reduced traffic flows on existing routes and provides the primary vehicular access to allocated sites.

The effectiveness of the Northern Link Road, between the A823 and Whitefield Road, has been tested within the Dunfermline Transport Assessment 2011 (see CD56).
undertaken to inform the adopted Dunfermline & West Fife Local Plan (2012) (CD8). There is a preliminary design of the NLR within the Dunfermline Strategic Development Area, but no detailed design will be required until such time as the NLR is required. The eastern and western extension of the NLR are being tested as part of the FIFEplan Strategic Transport Appraisal (STA) (CD19). The Assessment is being commissioned to look at wider impacts on the trunk road network. The STA has been arranged in discussion with Transport Scotland and with input from Fife Council Transportation and Environmental Services. It is expected that the information from this will inform development obligations and should be available ahead of the Plan Examination in 2015 (CD19)

Safeguarding and improving the environment are central to the Local Development Plan Strategy. The SEA Environmental Report (CD16) assesses the potential significant environmental impact of implementing the policies and proposals contained within the Plan across a number of themes and the summary for the strategy for Dunfermline is that it can be delivered without significant adverse impacts on the environment. A future detailed design for the Northern Link Road will be taken forward as part of the progression of the development framework for sites within the Dunfermline North Strategic Development Area. Proposals will establish an appropriate detailed line for the road, in the context of its landscape setting and other issues such as amenity, impact on issues relating to the amenity of existing residents such as noise, nuisance, smell, privacy, daylight etc. would be addressed at the detailed planning application stage. In this event, the set of Local Development Plan policies will help to protect existing amenity and assist the decision making process on planning applications. In addition, all development proposals will be assessed in the context of the draft Supplementary Guidance, ‘Making Fife’s Places’ (CD51) which explains the role of good design in creating successful places through an integrated approach to buildings, spaces and movement.

Property value is not a material planning consideration and concerns expressed about diminished house values cannot be addressed through the planning process.

Issues, including ground stability due to previous mine workings and potential flooding will be investigated further, as required, at more detailed stages and would form part of future planning applications. A Flood Risk Assessment will also be required by SEPA. Green Network Priorities identified as part of the development requirements for the DUN 067 Northern Link Road set out in the proposed FIFEplan (see Policy 4, Figure 4.1 and proposal DUN 067, pages 206 and 79 – CD5) are: to ensure that it functions as a street, with well-designed crossing points, so that it does not become a barrier to connectivity; and, to create a landscape and access link to Halbeath.

**Funding the proposed Northern Link Road**

Fife Council’s Planning Obligations Framework (March 2015) (see CD46) provides guidance on how developers are required to fund community infrastructure when this is needed as a result of new housing or commercial activity. FIFEplan requires developer investment in new roads and schools. Fife Council is also continuing to fund infrastructure through the approved Capital Plan and by exploring new funding mechanisms. This includes strategic transport interventions such as the Northern Link Road, where each developer along its route will be required, through planning conditions, to provide a section of the road through their site.
Suggested alternative routes and upgrading of other roads

With regard to an alternative suggested route linking to the M90, the costs to deliver such a route will far exceed the expected cost of delivering the alignment of the Northern Link Road within the proposed FIFEplan, with a resultant significant increase in transport contributions expected from developers. The formation of a new, or altered, interchange on the M90 requires the consent of Transport Scotland as Trunk Road Authority. In general, Transport Scotland will resist the formation of new motorway interchanges. The cost of works associated with the motorway will be significant. Linking a road to Junction 4 of the M90 takes vehicle movement to the north away from the Halbeath Interchange and introduces an additional approximate 5km travelling distance from the Halbeath Interchange. Creating a new interchange with the motorway between Halbeath and Kelty again takes traffic north. Motorists may, therefore, choose to utilise the existing Whitefield Road/Halbeath Road corridor.

Individual development proposals with the North Dunfermline Strategic Development Area, and wider, will be subject to traffic assessments which will identify measures and interventions required to make development proposals acceptable in terms of traffic impact and will require other upgrading of roads infrastructure, in addition to the delivery of the Northern Link Road.

Retail Park, Halbeath

The road line shown passing through land to the north of the retail park, and in its ownership, is indicative, and for this reason there has not been detailed involvement of the landowner. Fife Council is aware of aspirations for extension of the retail park to the north. The road line is a requirement for the Dunfermline North Strategic Development Area and will be safeguarded. The Council would ensure that retail park activity would not be compromised through planning conditions. Application 15/00778/FULL (SD3), submitted on behalf of Royal London Asset Management in April 2015, indicates that the area of land required for the road alignment would remain undeveloped.

For information, Fife Council road adoption records indicate that the unnamed road from Kingseat Road roundabout to its termination at the gates of the retail park is a public road maintained by Fife Council.

Link between DUN 067 and Lady Nairne Road

There is no proposal to extend Lady Nairne road for vehicular access to the Wellwood site (DUN 035 Dunfermline N/W/SW). The Proposals Map annotation in this area relates to Green Network Opportunities and the consultees comments appear to relate to a misreading of the mapping.

Consultation process

Representations expressing concerns about the consultation process will be addressed in the Statement of Conformity.

DUN 070 Pitreavie Roundabout

Suggestions with regard to local traffic management are too detailed for a Local Development Plan; however the comments have been forwarded to Transportation
Services for information and to take into account in future traffic management.

**Reporter’s conclusions:**

Lynebank Hospital - DUN 029 (a & b)

1. The need for more residential development in this area is addressed under Issue 3b, West Fife Area Strategies. Under Issue 3b, I conclude that a considerable amount of land for new dwellings is needed to meet established requirements. The Lynebank Hospital site can make a significant contribution to these requirements.

2. Regarding noise, pollution and disturbance, I recognise that construction work is likely to cause some disturbance to residents on adjoining or nearby sites. Keeping any such disturbance within reasonable limits can be sought by the council by, among other things, imposing conditions on any planning permission for development.

3. Details of the type, style, and layout of dwellings are matters to be resolved at the planning application stage. At the present time, the council estimates that the site has capacity for 200 dwellings.

4. I note that Halbeath Road already carries a significant volume of traffic. The site frontage to Halbeath Road is about 140 metres long and has good visibility. Potential access problems are described in the site assessment (reference DUN022). A transport assessment is necessary to determine how access to the site should be designed and what off-site measures might be needed to accommodate additional traffic. There appears to me to be adequate scope to design an access that would minimise disruption to the flow of traffic along Halbeath Road.

5. The effect of additional traffic on the strategic road network is addressed in the Strategic Transport Assessment (core document 19). Transport Scotland is now satisfied that the strategic transport infrastructure identified in the proposed plan is sufficient to accommodate the level of development proposed.

6. The state of the current rainwater drainage system on Halbeath Road does not appear to me to be a planning matter. If there is indeed a problem, it should be addressed irrespective of whether the Lynebank Hospital site is developed.

7. Regarding negative impact on the environment and degradation of local amenities, I note that the site has existing residential development to the north, west and south. Residential development on the site would be in keeping with these existing developments and would have the beneficial effect of bringing back into use a brownfield site that is currently unused.

8. Regarding the need to ensure that the provision of sensitive clinical care is maintained at the hospital site to the east, I consider it important that development on the site does not have an unacceptably adverse effect on hospital activities. In view of this, the required master-planning exercise should address this issue. The proposed plan should be altered accordingly.
Land at Masterton (west of Masterton Road) - DUN 030

9. Scottish Planning Policy (paragraph 256) says that the planning system should prevent development which would have a significant probability of being affected by flooding or which would increase the probability of flooding elsewhere. Reduction of functional floodplains should be avoided. Development on the proposed allocation site must conform to these requirements. To ensure this, a flood risk assessment should be carried out. Thereafter, design of development for the site should take into account the findings of the flood risk assessment. The proposed plan should be altered accordingly.

Paton Street North - DUN 031

10. I note that houses to the west, north and east of Paton Street North are generally single-storey or one-and-a-half storey in height. With a site area of 1.5 hectares, it seems to me that there is adequate space for the estimated number of houses. There is also space to provide a separation distance between the proposed houses and the adjoining existing houses sufficient to maintain acceptable levels of lighting, outlook and privacy.

11. Any planning application for development on the site would be subject to Policy 10: Amenity. Among other things, this policy seeks to protect the amenity of existing development.

12. I see no reason why the development envisaged for Paton Street North should necessarily be unsatisfactory. My conclusion is that the proposed plan need not be altered.

Dover Heights - DUN 037

13. In its initial representation regarding the Dover Heights site, Scottish Enterprise expressed support for the proposed plan. In a supplementary representation, Scottish Enterprise indicates that the intention is to have employment, community and leisure uses on four hectares of the site. The wording in the proposed plan suggests that four hectares would be for employment and that community and leisure uses would be in addition to this. Scottish Enterprise asks that the plan be amended to make clear that all three uses - employment, community and leisure - are to be provided within the four hectares.

14. Scottish Enterprise also points out that there is no watercourse within the site. The Scottish Environment Protection Agency has been consulted and agrees that the water feature in question is a drainage ditch, not a watercourse and that the requirement for a six-metre buffer strip is not appropriate.

15. The council raises no objection to the changes now sought by Scottish Enterprise.

16. I find that the plan should be altered to reflect the true development intentions for the site and to correct the misunderstanding concerning the drainage ditch.

Elliot Street - DUN 036

17. In response to a request for further information (FIR 17), the council advises that planning permission for the erection of 30 affordable flatted dwellings in two three-storey
blocks was granted in November 2015. The site to which the planning permission relates covers most of site DUN 036.

18. As there is now a commitment to residential development on site DUN 036, I conclude that its housing designation in the proposed plan should remain. The plan need not be altered.

Axis Point - DUN 051 and Halbeath Interchange - DUN 059

19. These sites adjoin Calais Muir Wood, which is said to be an ancient woodland. Land immediately to the south of Calais Muir Wood has been developed with houses. It has not been suggested that this development has had any significantly adverse impact on the ancient woodland. Visual inspection during a site visit did not reveal any obviously detrimental effect.

20. I do not accept that sites DUN 051 and DUN 059 should be deleted. They extend some distance from the edge of the ancient woodland. This gives scope to keep development at a distance from the woodland sufficient to avoid significant adverse impact. I agree that controls should be applied to protect the woodland. I note the suggestion that this should involve survey work and protective buffering. The council’s response indicates that the need for a buffer strip could be included in the proposed plan. In my view, the width of any such strip would best be determined by detailed site survey work at the planning application stage.

21. My conclusion is that the proposed plan should be amended to include reference to the ancient woodland and the need for a protective strip, the extent of which would be determined following a detailed survey.

South of Elliot Street - DUN 060

22. The eastern end of site DUN 060 is occupied by a car park associated with the adjacent Asda store. In response to a request for further information (request 17), the council advises that this is an error. The site should not include the car park.

23. From my inspection, I note that one access to the site is by means of Upper Millhill Street and Millhill Street. These streets are residential. At the time of my inspection, visibility at the cross-roads with Brucefield Avenue was restricted by parked vehicles. I find that, from both environmental and safety points of view, this is not an entirely satisfactory route for business traffic.

24. The site can also be approached from the A823, using Erskine Beveridge Court. This would overcome concerns expressed in the representations, and should be encouraged by suitable text in the proposed plan.

25. Proximity of the Asda store does not provide as good a quality of environment as would be appropriate for residential development. The development management process, backed up by Policy 10: Amenity, can ensure that development on the site does not have an unacceptable effect on the amenity of nearby existing dwellings.

26. My conclusions are: the employment allocation should be retained in the plan; the site boundary should be amended to exclude the car park area; the site area should be adjusted to reflect the new boundary; and the plan should express a preference for use...
of Erskine Beveridge Court as the means of access to the site.

Charlestown Rail Junction - DUN 066

27. On the proposals map DUN 066 is shown as a “rail proposal”. This is also the description given on page 78 of the proposed plan. In the Action Programme for the proposed plan, the entry for DUN 066 in table 6 says, in the action column, “consult Transport Scotland”. There is no entry in the column that shows anticipated timescale. I find that DUN 066 is clearly a rail proposal.

28. Scottish Planning Policy, paragraph 277, says: “Agreement should be reached with Transport Scotland and Network Rail before rail proposals are included in a development plan…..”

29. From the representation, I note that Transport Scotland has not agreed that DUN 066 be included in the proposed plan. Transport Scotland’s concerns include: lack of train paths from Charlestown Junction into Edinburgh; undeliverability of passenger services between Alloa and Edinburgh via the Forth Bridge; no commitment in the Strategic Transport Projects Review; lack of a robust, multi-modal appraisal; and lack of a business case. The council’s response does nothing to address or rebut the concerns raised by Transport Scotland.

30. I find that inclusion of DUN 066 in the proposed plan is not in accord with advice in Scottish Planning Policy. My conclusion is that DUN 066 should not be included in the plan as a proposal. However, I note that paragraph 64 of SESplan refers to an aspiration to re-introduce certain passenger rail services. In view of this, I find that the proposed plan, where appropriate, may safeguard a rail route in a situation where the route has not reached the stage at which it may be designated as a proposal. In the present case, a safeguarding provision would help ensure that the route shown in DUN 066 is kept clear of development pending further detailed investigation of the feasibility of construction of a new section of rail line. The proposed plan should be altered accordingly.

Northern Link Road - DUN 067 - general

31. The purpose of the Northern Link Road is to accommodate traffic associated with development at north Dunfermline. The chief component of this development is housing. The proposed plan (page 71) estimates that there is capacity for 3,000 dwellings on all but one of the sites at north Dunfermline. The omitted site forms part of site DUN 035 and appears to have capacity for a substantial amount of development.

32. From the foregoing, I find that the Northern Link Road is likely to be used by a large amount of traffic and that much of the traffic is likely to come from or to have a destination in the proposed new development at north Dunfermline.

33. I note that the proposed plan (page 79, DUN 067) says “Ensure that the new northern link road functions as a street, with well-designed crossing points, so that it does not become a barrier to connectivity.” I find no suggestion that the Northern Link Road is intended to function as an A907 bypass for Dunfermline.

34. My conclusion from all this is that the Northern Link Road cannot justifiably be criticised for bringing a huge amount of traffic through a populated area.
35. I accept that there will be increased pollution, but pollution is a feature of all motor vehicle routes. If the Northern Link Road facilitates reasonably free-flowing traffic and speed is limited to that appropriate to an urban street, the amount of pollution is unlikely to exceed acceptable levels.

36. Regarding more traffic and congestion on the west side of Dunfermline, it is the required development that gives rise to more traffic. The Northern Link Road is one means of seeking to accommodate the traffic in a satisfactory manner.

37. Concern about loss of green areas, or greenspace, is addressed under Issue 3b. Policy 7: Development in the Countryside seeks to protect prime agricultural land but also recognises that development on such land may be necessary as part of the settlement strategy. That is the case at north Dunfermline.

38. Text on page 70 of the proposed plan says that the route of the Northern Link Road as shown on the proposals map is “indicative”. From this, I take it that the route is subject to adjustment at the master-planning and detailed design stages. While certain parts of the route appear to offer limited scope for adjustment, for example the end points and the section between Townhill and Town Loch, there does appear to be opportunity to adjust most of the route so that it relates satisfactorily to existing and proposed green spaces.

39. Regarding concern that there should be more detail before the Northern Link Road is considered further, I find that the indicative route shown on the proposals map is sufficient to permit adequate assessment of the merits of the Northern Link Road at this stage of the planning process.

40. There is concern regarding funding for and timeous completion of the Northern Link Road. Funding can be sought from developers when they come to apply for planning permission for development of the site allocations that give rise to the need for the new road. Policy 4: Planning Obligations makes specific reference to this.

41. The master-planning work that is required in terms of DUN 035 on page 70 of the proposed plan and in terms of the “Strategic Development Area” on page 71 of the plan includes “phasing of the sites”. I find that this gives scope to consider how the timing of construction of the Northern Link Road should relate to construction of dwellings and other development at north Dunfermline. Timeous construction of the Northern Link Road could then be ensured through the planning application process.

Northern Link Road - DUN 067 - alternative alignment (Bellyeoman Community Council)

42. The alternative route advocated by Bellyeoman Community Council appears to me to have certain disadvantages.

43. First, it involves a longer length of new road. From the A823 at Wellwood to Halbeath Retail Park is a distance of some 4.4 kilometres along the indicative line for the Northern Link Road shown on the proposals map. From the same starting point, the distance to the M90 using the line suggested by the community council is some 6.2 kilometres. Cost of a new road is not necessarily proportional to length of route because the need for structures and land acquisition costs may vary, but it seems to me that an additional 1.8 kilometres would add significantly to the cost of the proposed road.
44. Second, it involves a new junction on the M90. There is no indication that Transport Scotland would agree to this. The cost is likely to be substantial.

45. Third, from the A823 at Wellwood using the Northern Link Road route on the proposals map to junction 3 on the M90 is a distance of some 4.7 kilometres. From the same point using the community council’s amended route, the distance to junction 3 is some 8.9 kilometres. Thus a driver wishing to travel south on the M90 would have a journey that was 4.2 kilometres longer when using the amended route.

46. Fourth, if use of the amended route were perceived as being too circuitous and time-consuming, drivers wishing to travel south on the M90 might decide to use the A823 going south through Dunfermline. This would conflict with the council’s intention that there be no increase in traffic flows on existing routes.

47. In my view, these disadvantages mean that it would not be appropriate to alter the indicative route in the way suggested by the community council.

Northern Link Road - DUN 067 - Townhill and Townhill Country Park and alternative alignment (Townhill Community Council)

48. Major concerns of many representors are traffic and environmental effects of routing the Northern Link Road between Townhill and Town Loch. Townhill Community Council suggests that the Northern Link Road follow a route north of Townhill and round the edge of Townhill Wood, joining up with the proposed development at Halbeath. A further information request (FIR 30) has elicited council responses to a number of these points.

49. I find that the Northern Link Road would provide a convenient route between the large-scale development proposed for north Dunfermline and the strategic road network at Halbeath, where there are connections to the M90 and A92. I consider it likely that, for most drivers, apart from those making local trips, the Northern Link Road would be a much more attractive route than Townhill Road. The latter would involve a relatively slow journey using busy town centre streets.

50. For those wishing to travel to or from locations to the north, there would be the option of leaving the Northern Link Road at its junction with A823. This may well be more attractive than negotiating Townhill Main Street and then Cairncubie Road, with its sharp bends.

51. My conclusion is that the Northern Link Road would be unlikely to result in an unacceptable increase in the amount of traffic on Townhill Road and Townhill Main Street.

52. From my site inspection, I note that houses on the south-west side of Stewart Street are very close to the proposed alignment of the Northern Link Road. The preliminary design contained in the Dunfermline SLA Transport Assessment 2011 (page 93, with a more legible version provided in response to the further information request, FIR 30) shows a retaining wall hereabouts. The closeness of the road and the possibility that it may be elevated above surrounding ground level suggest to me that concern about impact on the southern edge of Townhill is justified.

53. The design mentioned in the preceding paragraph is preliminary. It is therefore
subject to amendment if progressed to a more detailed stage. In addition, I am recommending that proposed development of land to the immediate south-west (site TWH 002) be deleted from the plan (see Issue 7b, Townhill). This may give some scope for moving the road further from the houses.

54. My conclusion is that, if the notional alignment shown on the proposals map is to be retained, text in the plan must emphasise the need to design the road so that impact on houses on the south-west side of Stewart Street is minimised.

55. In its response to the further information request, FIR 30, the council says that where the Northern Link Road crosses Townhill Main Street the intention would be to provide a signalised cross-roads junction. The level of the railway track would be raised. The railway bridge and the associated hump in the road would be removed. I find that this adequately addresses the concern about how the new road would intersect with Main Street.

56. Also in its response to FIR 30, the council says that it is intended to remove the railway embankment in the vicinity of Loch Street and to remove the Loch Street bridge. A pedestrian crossing could be provided on the Northern Link Road.

57. From my site inspection, I note that the railway embankment separates Townhill from the country park and is a barrier to movement between the two. The proposed Northern Link Road would also be a barrier in that any busy road can be difficult for pedestrians to cross and can constitute a safety hazard for young persons and those with impaired mobility. The provision of one or more light-controlled pedestrian crossings would reduce the barrier effect of the proposed road. Removal of the embankment could offer opportunity for provision of a landscaped strip between the road and the village. My conclusion is that concerns about continued connection between the village and the country park and impact on the west side of the village can be addressed satisfactorily. The need to do this should be stated in the proposed plan.

58. Townhill Community Council suggests that the Northern Link Road should go to the north of Townhill. Fife Council estimates that this would add some 700 metres to the length of the road. It says that most of the land crossed by a route to the north of the village is neither allocated for development nor owned by the council.

59. I find that the considerations raised by Fife Council weigh heavily against a route to the north of the village. Land acquisition and additional road length could add significantly to the cost of the road. This in turn would require an increase in developer contributions. It has not been demonstrated what effect such an increase would have on the affected developments.

60. It has not been shown that those who own the land needed for the north route would be willing to sell. An owner might be unwilling to sell. Compulsory purchase could be attempted, but confirmation of a compulsory purchase order could not be guaranteed.

61. From the foregoing, I find that there is considerable uncertainty as to the practicality of the north route. Taking this into account along with my conclusions regarding concerns about impact of the south route on Townhill, my overall conclusion is that the Northern Link Road alignment shown in the proposed plan should not be altered. Text in the plan should include the references to minimising impact on the Stewart Street
houses, provision of landscaping and provision of one or more pedestrian crossings

Northern Link Road - DUN 067 - alternatives to the proposed link road

62. Using the A823 northwards from Wellwood to the B914 thence eastwards to junction 4 on the M90 at Kelty involves a distance of 10 kilometres. If the desire is to travel south on the M90, there would be a further 5.8 kilometres to junction 3, giving a total of 15.8 kilometres. From Wellwood to junction 3 using the A823 southbound then the A907 eastbound is a distance of 5.5 kilometres. The difference between this and a journey of over 15 kilometres suggests to me that many drivers with a destination to the south would use the shorter route or would continue south on the A823 through central Dunfermline and thence to junction 2. Thus existing roads within the town would be used by significantly increased volumes of traffic. It has not been demonstrated that these roads could adequately accommodate the additional traffic. This would also contradict the council’s intention that there be no increase in traffic flows on existing routes.

63. My conclusion is that use of existing routes to the north of Dunfermline would not provide an acceptable alternative to construction of the Northern Link Road.

64. Reference is made to a southern relief road. I take this to be in effect a reference to the Rosyth Bypass (ROS 019). I note from page 90 of the Action Programme for the proposed plan that the Rosyth Bypass is envisaged as being led by the private sector and that there are no dates for implementation. I find no assurance that the Rosyth Bypass would be constructed at an early date. My conclusion is that reliance cannot be placed on this proposed road if significant amounts of development in north Dunfermline are to be facilitated within the plan period.

Northern Link Road - DUN 067 - effect on other routes

65. There are concerns that little regard has been given to increased traffic on already congested routes to shopping centres, places of work and other destinations. Bellyeoman Community Council expresses concern about congestion along the Halbeath Road corridor. Others have concerns about a variety of locations, including Kingseat Road (railway level crossing), Whitefield Road, Townhill Road and East Baldridge Drive.

66. A submission from North Dunfermline Community Groups that was received on 12 July 2016 refers to a transport assessment that accompanies a recent planning application for permission to extend Halbeath Retail Park. It is contended that this assessment was not required to take into account other committed developments. Nevertheless, one of the assessment’s findings is that the Halbeath Road approach to junction 3 of the M90 is already at capacity and will need the limited available additional works to cope with the further traffic that will use the retail park.

67. In a request for further information (FIR 108), the council was asked to respond to the submission from North Dunfermline Community Groups. The council refers to the transport assessment proposed mitigation measure, which is optimising the existing traffic signals at junction 3. Modification of signal timings provides a significant improvement to the operation of, and releases substantial spare capacity of, the junction 3 Halbeath interchange.
68. In my view, the various concerns are justified. The proposed plan envisages construction of well over 3,000 dwellings in north Dunfermline. Development on this scale could have significant effects on the road network.

69. I note that the Strategic Transport Assessment (core document 19) was completed in May 2015. On page 10, it identifies some increased queuing at junction 3 on the M90 (Halbeath). So far as I can see, the Assessment identifies no problem on the relatively short section of A907 between the Kingseat Road roundabout and the motorway M90 nor any problem on Halbeath Road going west from the roundabout. I note that optimisation of the traffic signals at junction 3 (Halbeath) on the M90 could release substantial spare capacity.

70. The council refers to traffic assessments for individual proposals. I agree that such assessments could identify traffic issues of a more local character than the strategic issues considered in the Strategic Transport Assessment.

71. My conclusion is that the findings of the Strategic Transport Assessment and the prospect of having traffic assessments for individual proposals adequately address concerns about additional traffic and the capacity of junction 3 on the M90.

72. The proposed plan appears to contain no requirement that traffic, or transport, assessments be carried out. Such assessments are necessary to meet the justified concerns about congestion. The proposed plan should include them as a development requirement for site DUN 035 (Dunfermline N/W/SW), and for the North Dunfermline Strategic Development Area sites (DUN 038, DUN 039, DUN 040/DUN 041, DUN 042, DUN 043, DUN 044, DUN 045 and DUN 046). The proposed plan should be altered accordingly.

73. I note the concern regarding Lady Nairne Road. The proposals map in the proposed plan does not show a connection between Lady Nairne Road and the Northern Link Road and I am not aware of any reason why there should be increased traffic on Lady Nairne Road.

Northern Link Road - DUN 067 - alignment at Halbeath Retail Park

74. Justification in principle for the Northern Link Road is considered under Issue 3b: West Fife Area Strategies. The road would provide essential access to the proposed development sites through which it would pass. It would also be essential to avoid or minimise additional traffic adversely affecting operation of existing routes within Dunfermline. Adoption of an alignment that terminates on Kingseat Road facilitates a direct connection between the strategic road network and the major development sites that are required in north Dunfermline. At the same time it addresses concern that congestion on Halbeath Road should not be made worse.

75. Concerns regarding the consultation process are considered under Issue 1: General Comments.

76. I note the proposals for additional development at Halbeath Retail Park, contained in planning application 15/00778/FULL. The council says that these proposals would leave undeveloped the area of land required for the Northern Link Road.

77. The representor says that the indicative line links onto a private service access
road at Halbeath Retail Park. The council says that, at this location, there is a public road. In any event, the primary issue is whether, on the face of it, there appears to be a feasible route for the Northern Link Road in this locality.

78. My conclusions are: there is justification for an indicative alignment that terminates on Kingseat Road and that traverses part of the undeveloped land to the north of the retail park; and there does appear to be a feasible route in this locality. There is no need to alter the proposed plan.

Northern Link Road - DUN 067 - impact on amenity

79. New development may affect the amenity of existing development. For example, a view of open countryside may be blocked by new houses. This can rarely be avoided if communities are to expand to meet the need for more dwellings and other facilities. Two of the principles of the planning system are: supporting the delivery of accessible housing and other development; and protecting the amenity of existing development (Scottish Planning Policy, paragraph 29).

80. In this context, I find that new development should pay adequate respect to existing development. The amenity of the latter should be maintained at an acceptable level. If this is done, any detrimental impact on house values that nevertheless occurs must be taken as unavoidable and is not a matter that calls for any change to the proposed plan.

81. I note the particular concern about green areas in the vicinity of East Baldridge Drive and West Baldridge Road. The scale of development that is required will cause a major change in the outlook from existing properties on the north edge of the Baldridge area. As pointed out above, such change is unavoidable if need for new dwellings is to be met. Development requirements for site DUN 035 include landscape improvements and provision for an urban park. The master-planning process should ensure that there is a satisfactory relationship between new and existing development.

Pitreavie Roundabout - DUN 070

82. From my inspection of Pitreavie roundabout, I find that provision for pedestrians is not ideal and that conditions for cyclists are challenging. These circumstances are particularly significant given the proximity of Rosyth Station and the requirement that the planning system should support patterns of development that provide safe and convenient opportunities for walking and cycling and facilitate travel by public transport (Scottish Planning Policy, paragraph 270). In view of all these considerations, it would be appropriate for the proposed plan to refer to provision for pedestrians and cyclists as part of the development requirements for proposal DUN 070.

Reporter’s recommendations:

I recommend that the following modifications be made:

1. On page 69 of the proposed plan, in the development requirements for site DUN 029 (a & b), Lynebank Hospital insert the following.

   “The master plan should address the need to ensure that development on the site does not have an unacceptably adverse effect on hospital activities.”
2. On page 69 of the proposed plan, in the text for site DUN 030, Land at Masterton (west of Masterton Road) insert the following development requirement.

   “A flood risk assessment is required. Design of development must take account of the findings of the flood risk assessment.”

3. On page 70 of the proposed plan, in the text for Dunfermline N/W/SW (DUN 035) insert the following after the “Recycling facilities” bullet point.

   “To address concerns about the effect of development on the transport network, including Halbeath Road corridor, Kingseat Road (railway level crossing), Whitefield Road, Townhill Road and East Baldridge Drive, transport assessments for each individual development must be carried out. The assessments will not be confined to the locations just mentioned but will consider the effects on the whole of the transport network. The assessments must include the effects of traffic on air quality. The assessments must identify mitigation measures needed to maintain the efficiency of the transport network and to avoid unacceptable effects on air quality.”

   Note. The references to air quality arise from the “Dunfermline and Halbeath - miscellaneous - Appin Crescent” section of Issue 7a(4).

4. On page 71 of the proposed plan, in the text for Dover Heights (DUN 037):

   (i) delete the two sentences “This site should also accommodate ….. watercourse is required.”

   (ii) in place of the deletion, put: “The site should also accommodate approximately four hectares of employment, community, retail and leisure use to be agreed with Fife Council.”

5. On page 71 of the proposed plan, in the text for the North Dunfermline Strategic Development Area insert the following after the “Recycling facilities” bullet point.

   “To address concerns about the effect of development on the transport network, including Halbeath Road corridor, Kingseat Road (railway level crossing), Whitefield Road, Townhill Road and East Baldridge Drive, transport assessments for each individual development must be carried out. The assessments will not be confined to the locations just mentioned but will consider the effects on the whole of the transport network. The assessments must include the effects of traffic on air quality. The assessments must identify mitigation measures needed to maintain the efficiency of the transport network and to avoid unacceptable effects on air quality.”

   Note. The references to air quality arise from the “Dunfermline and Halbeath - miscellaneous - Appin Crescent” section of Issue 7a(4).

6. On page 76 of the proposed plan, in the development requirements for site DUN 051, Axis Point, insert the following.

   “The site adjoins ancient woodland. A protective strip is required between development and the woodland to ensure no detriment to the woodland. Detailed survey required to determine the width of the strip.”
7. On page 77 of the proposed plan, in the development requirements for site DUN 059, Halbeath Interchange, insert the following.

“The site adjoins ancient woodland. A protective strip is required between development and the woodland to ensure no detriment to the woodland. Detailed survey required to determine the width of the strip.”

8. On page 77 of the proposed plan, with regard to site DUN 060, South of Elliot Street, amend the site area to reflect exclusion of the car park from the site and include the following among the development requirements.

“Preferred means of access is along Erskine Beveridge Court.”

9. On the Dunfermline, Townhill, Crossford and Halbeath inset map, amend the south-eastern boundary of site DUN 060, South of Elliot Street, to exclude the car park.

10. On page 78 of the proposed plan, in the entry for DUN 066 - Charlestown Rail Junction - Additional Southern Link:

   (i) under "Description" delete "Rail Proposal" and put instead "Rail line safeguarding"; and

   (ii) under "Status, additional development requirements, and other information" add two new sentences: “The feasibility of constructing this link has not yet been established and is not approved by Transport Scotland. In the meantime, the route of the link should be kept clear of development.”

11. In the key panel for the proposals map insert a notation for “Rail Safeguard”. On the Dunfermline, Townhill, Crossford and Halbeath inset delete the notation for DUN 066 and put instead the notation for Rail Safeguard.

12. On page 79 of the proposed plan, with regard to DUN 067, Northern Link Road, insert the following text.

   “Particular care must be taken to minimise the impact of the road on the amenity of houses on the south-west side of Stewart Street, Townhill.”

   “Careful consideration must be given to the provision of one or more light-controlled pedestrian crossings to provide safe and convenient access between Townhill and the country park.”

   “Removal of the railway embankment on the west side of Townhill offers opportunity for provision of a landscaped strip to reduce the impact of the road on this part of the village.”

13. On page 79 of the proposed plan, with regard to site DUN 070, Pitreavie Roundabout, include the following after “… northern approach roads”.

   “Particular consideration to be given to provision for pedestrians and cyclists.”
## Issue 7a(2) Dunfermline & Halbeath – Strategic Development Areas

**Development plan reference:** Settlement Plan: Dunfermline & Halbeath (pages70 – 75)  
**Reporter:** Robert Maslin

### Body or person(s) submitting a representation raising the issue (including reference number):

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### PROPOSED FIFE LOCAL DEVELOPMENT PLAN

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### DUN039 North Dunfermline (Colton)

- Raymond Pringle (484)
- Townhill Community Council (635)
- Maria Smeaton (672)
- Gemma Nicolson (1328)
- SEPA (3371)
- David Croft (3882)

### DUN040/41 CRAIGLUSCAR ROAD/CARNOCK ROAD/NORTH DUNFERMLINE (SWALLOW DRUM)

#### DUN040 Craigluscar Road/Carnock Road

- Alex MacLeod (60)
- Douglas Morris (147)
- Sandra Gilmour (793)

- Beatrice Walker (1120)
- Bennett Black (1127)
- W M McInally (1460)
- Janek Matysiak (1493)
- S Baxter (1639)
- Andrew Thomson (2047)
- SEPA (3374)
- Milesmark & Baldrige Community Council (3727)

#### DUN041 North Dunfermline (Swallow Drum)

- Campion Homes Ltd (849)
- Beatrice Walker (1124)
- Bennett Black (1128)
- W M McInally (1461)
- Janek Matysiak (1494)
- S Baxter (1638)
- SEPA (3375)
- Milesmark & Baldrige Community Council (3726)
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<td>Milesmark &amp; Baldrige Community Council (3728)</td>
<td>Elaine Spalding (3043)</td>
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**DUN043 Halbeath**

| John Gunn (55) | Janet MacPherson (3003) |
| Kingseat Community Council (359) | Mary Tully (3008) |
| Alex Allan (381, 384) | James Forbes (3011) |
| A Shread (398) | Kevin Cummings (3014) |
| Watson Wilson (399) | Steve McLean (3029) |
| Walter Sinclair (403) | Mark Monaghan (3032) |
| W H Ramsay (405) | Sharon Monaghan (3035) |
| T Hogg (408) | James Spalding (3040) |
| Steven Liddle (416) | Elaine Spalding (3043) |
| Alexander Lees (417) | E McLean (3053) |
| Sheena Keenan (420) | David McLean (3063) |
| Sandra Stothard (422) | Sheila Malpas (3069) |
| Alexander Whyte (424) | Lisa Malpas (3079) |
| Robert W Hutchinson (425) | Mary Simpson (3095) |
| S R Hutchinson (428) | Kenneth Walker (3104) |
| Allyson Fawcett (432) | Steven Bowman (3109) |
| R Stuart (433) | Sharon Easton (3115) |
| R R H Dacre (437) | Jean Tait (3124) |
| Andrew Penman (440) | Rachel Thomson (3131) |
| R Millar (446) | Lorna Clark (3180) |
| Anne Clayton (447) | Pamela Paxton (3185) |
| Peter McNamee (451) | Aileen Emms (3190) |
| Peter Fawcett (455) | David Stubbs (3193) |
| Paula Gregory (457) | James Leggate (3197) |
| Michael Scanlin (462) | Michael J Emms (3224) |
| Margaret Heawood (470) | Kevin Searle (3241) |
| Margaret Crawford (473) | Christine Hyde (3262) |
| Malcolm MacKay (478) | Barbara Inglis (3272) |
| M Shread (482) | Calum Dewar (3288) |
| Leslie Smith (490) | SEPA (3376) |
| June Greig (491) | Catherine Brownlee - Noble (3428) |
| Wilma Donaghy (493) | Elizabeth Bailey (3432) |
| K Donaghy (495) | Gail Hogg (3436) |
| Laura Wiseman (497) | Ian Harper (3444) |
| Laura Maconachie (522) | Irene Marshall (3464) |
| Kathleen Campbell (525) | Janet Brown (3470) |
| Joan Spowart (527) | Janet Saunderson (3486) |
| Halbeath Residents and Tenants Association (3752) | Lee McLean - Marshall (3506) |
| Alain Ainslie (3527) | Norman Ainslie (3527) |
| J Nicol (3532) | Jane Ainslie (3537) |
| Malignant Nobility (3595) | Niall Frame-Noble (3595) |
| Robert Lowes Noble (3598) | Janet Saunderson (3506) |
| Steven Inglis (3603) | Graeme A Whyte (3621) |
| Stuart Nicol (3606) | Taylor Wimpey (3694) |
| V Richardson (3610) | Halbeath Residents and Tenants Association (3752) |
### Provision of the development plan to which the issue relates:

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<tr>
<th>Area</th>
<th>Contact Details</th>
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<tbody>
<tr>
<td>DUN044 Land to the north of Wellwood</td>
<td>David McLean (3896) R Keningale (3925) Omnivale Ltd (1888) SEPA (3377)</td>
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<td>DUN045 Rosegreen, Carnock Road</td>
<td>Campion Homes Ltd (1213) Janek Matysiak (1496) S Baxter (1642) SEPA (3378) Milesmark &amp; Baldrige Community Council (3729)</td>
</tr>
</tbody>
</table>

Settlement Plan: Dunfermline & Halbeath

488
## Planning authority’s summary of the representation(s):

### Dunfermline Strategic Development Areas

**Scottish Natural Heritage (898):** We reiterate our previous advice that an overall Development Framework is required to set the direction for effective delivery of development within the Strategic Development Area

**Omnivale Ltd. (1891):** Object to the inclusion of “health care” within the list of detailed requirements that developers of the SDA are expected to provide. Provision of health care facilities across Scotland is the responsibility of separate funding by Scottish Ministers and outside the scope of this plan. Object to the reference to "local shops" in the list of requirements. There is already a shop serving the community of Wellwood which would suffer from provision of another shop nearby. The reference to provision of "local shops" should be deleted from the plan altogether or related to a specific part of the North Dunfermline Strategic Growth Area which is more than 400m away from the existing shop at Wellwood. There is no need to make provision for a shop within DUN 044 Land to the north of Wellwood.

### DUN035 Dunfermline N/W/SW

**Scottish Enterprise (1053):** Supports the allocation of the Strategic Development Area (SDA) for Dunfermline, and the identification of 80ha of land for employment. Scottish Enterprise considers this land should be identified as strategic employment land.

**Christine Johnston (1244), Hugh Johnston (1246), Rose Johnston (1251):** Object to inclusion of DUN035, and any proposal to extend Lady Nairne Road, referenced DUN067 Northern Link Road. Proposals should meet the standards set by Scottish Planning Policy (CD1) and further planning advice, solely on the basis the proposals are driven by the local authority and not a developer driven by cash incentives. It appears irresponsible that the local authority should put forward proposals, which do not meet their own strategies and polices in addition to disregarding national planning policy. Issues highlighted concerning Lady Nairne Road could be eliminated by including a protective clause within DUN067 Northern Link Road that will discourage any future developers submitting proposals based on using Lady Nairne Road as an access to DUN035. It could also help to safeguard the existing local amenities and help maintain the rich biodiversity of the area.

**Stirling Developments (3680):** Support the continued identification of the Dunfermline Strategic Land Allocation. Stirling Development expects to submit an application for Planning Permission in Principle, supported by a Development Framework/ Masterplan during the course of 2015. In parallel to the PPP application, Stirling Developments also intend to submit an application for planning permission for the first phase of development at Broomhall.

**Logie & Pittencrief Estate (2260):** In principle, the area as shown in the draft Fife Local Development Plan as being suitable for residential development is satisfactory. However, the Estate wishes to have an input into any design and layout to minimise impact on the amenity of the area and to minimise the loss of agricultural land from the farming enterprise. Accordingly, the Estate reserves the right to decide on the extent and amount of any release of land at a future date once the "overall picture" of the...
Master Plan is known.

SEPA (3366): Support Development Requirements for Flood Risk Assessment, buffer strip along the watercourse and feasibility study to enable consideration of the potential for restoration and improvement of the water environment through the site design.

NHS Fife (3844): Potential additional 4200 houses in local area will impact on healthcare services. Note the reference in draft plan for healthcare services requirement. Understanding of timescale for developments would assist in planning of potential changes in delivery of healthcare services.

DUN038 Kent Street

Townhill Community Council (634): Object to inclusion of site DUN038. Development of this site would result in: coalescence between Townhill and Dunfermline; undue pressure on Townhill Primary School roll; and transport issues.

Robert Peattie (30) (275): Object to inclusion of sites DUN038 and DUN046 Chamberfield Road as they appear to directly oppose or contradict the conclusions reached from the consultation for the Development Plan Strategy Dec 2013 (CD13).

Willkins Family (1191): There are considered to be no known environmental, infrastructure, educational, access or other constraints which would affect the suitability of the subject site for housing. The site, subject to a Local Development Plan allocation, is capable of delivering housing within the first 5 year period of the Local Development Plan period. The site can provide for the early delivery of part of the SESplan North Dunfermline SDA allocation (with the neighbouring site) and therefore positively contribute towards the delivery of the SESplan and FIFEplan development strategy. See submitted documents 1.Indicative Site Layout, 2.Indicative Site Layout with neighbouring site, 3.Transport Statement, and 4.Townhill Primary School Catchment Plan.

Raymond Pringle (483), Lindsay Spence (507), Linda Cowan (624), Maria Smeaton (671), Nuala Connelly (734), Christine Oliver (820), Gemma Nicolson (1327), Craig Anderson (1793), Paul Munro (1839): Object to the inclusion of DUN038. The development would lead to coalescence between Townhill and Dunfermline and hence the loss of the village identity. Along with other development proposals at Chamberfield and Colton, it would have a significant impact on Townhill Primary School, taking it beyond its current capacity limit. It would produce a significant increase in traffic on already heavily used roads with major junction constraints, leading to more traffic, to an unacceptable level. It would also have a detrimental effect on the Country Park and its wildlife.

Alan Gray (776), Sally Gray (996): Object to the proposed developments at DUN038 and DUN046 Chamberfield Road. Adverse effect on the residential amenity of neighbours e.g noise, disturbance, overlooking, loss of privacy, overshadowing, and drainage concerns. In addition, overdevelopment of the site, visual impact of the development, effect of the development on the character of the neighbourhood. The development would adversely affect highway safety or the convenience of road users on Townhill Road, the junction at Chamberfield Road and the areas surrounding Townhill Road. Access to our property during development and beyond. Wildlife in the area would be affected. Local primary and secondary schools would not be able to cope. Fife Council and developers have not done a full assessment of the site to prove the site is suitable
for proposed development, e.g. old mine workings, water tables and adjacent gas pipelines.

Cliff Dudley (2316), Angela Dudley (2319), Pamela Parker (2320), Gail Robertson (2321), Tom Minogue (2323), Agnes Minogue (2325), David Lyth (2326), Helen Lyth (2327), Drew Mitchell (2328), Nan Allen (2330), John Allen (2331), Jean Bullard (2332), Andrew Sim (2333, 2608), Vicky Harrison (2315): Object to the proposed developments at DUN038 and DUN046 Chamberfield Road. The new developments at Kent Street and Chamberfield will almost double Townhill's housing area, and perhaps population. This is devastating for a community. It will increase the pressure on Townhill road, which is already impassable when large vehicles are using it.

SEPA (3370) Support Development Requirements for Flood Risk Assessment, buffer strip along the watercourse and feasibility study to enable consideration of the potential for restoration and improvement of the water environment through the site design.

David Croft (3870): Objects to Proposal DUN038 on the following grounds:

- The development would encroach on Townhill Country Park, impacting on leisure activities in the park and access to the park by pedestrians and cyclists from Chamberfield Road and reducing the attractiveness of the park to visitors.
- Impacts of increased traffic (including construction traffic) creating noise, congestion, air pollution and increased risk of accidents.
- Adverse impact on wildlife.
- Flooding problems on Kent Street and impact on the sewage system.
- Townhill primary school has insufficient capacity for growth.
- Capacity of health and dental facilities is already an issue in the area.
- People would not want to live under overhead cables.
- The two fields remaining to the south and south west of Townhill Loch will be isolated from other agricultural land making them likely to fall into disuse and ultimately resulting in further development.
- The development is likely to serve commuters from south of the Forth rather than local people.
- Fife will have to bear the cost of infrastructure and services with little long term economic benefit to the area.
- Given the challenges of the slope, flood exclusion zones and restriction on development within 10m of woodland the development proposed would be at a higher density than the surrounding areas. This indicates that it may be flatted development which would be out of keeping with the surrounding area.
- Planning permission for the site has been previously refused by a Scottish Reporter, nothing has changed that would support development on this land.

Development on Proposal DUN038 along with Proposals DUN039 North Dunfermline (Colton), DUN044 Land to the north of Wellwood, DUN46 Chamberfield Road, DUN067 Northern Link Road, TWH001 Townhill Power Station Site and TWH002 Townhill Loch Car Park would largely enclose the country park impacting the wildlife in the park. Development on proposal DUN043 Halbeath would further reduce wildlife access to the country park. This site should either remain as agricultural land or be absorbed into the country park.
### DUN039 North Dunfermline (Colton)

Kingseat Community Council (635): Object to the inclusion of site DUN 039. The Community Council wishes to record that it has no objection in principle to housing on this site and appreciates the measures outlined to mitigate against coalescence with the village, the safeguards to avoid impact on the Country Park, but until clarity is received on the transport and schools issues, its position is to object to the development of the site at (DUN 039) Colton.

Raymond Pringle (484), Maria Smeaton (672), Gemma Nicolson (1328), Object to inclusion of DUN039 due to the impact it would have on various parts of our village, including the environment, schools and transportation. Impact on the Country Park and coalescence with Dunfermline are also concerns.


David Croft (3882): Objects to Proposal DUN039 on the following grounds:

- The development would encroach on Townhill Country Park, impacting on leisure activities in the park and the adjoining golf course and reducing the attractiveness of the park to visitors.
- Impacts of increased traffic (including construction traffic) creating noise, congestion, air pollution and increased risk of accidents.
- Adverse impact on wildlife.
- Impact on the sewage system.
- Townhill primary school has insufficient capacity for growth.
- Capacity of health and dental facilities is already an issue in the area.
- Loss of valuable agricultural land and the two fields remaining to the south and south west of Townhill Loch will be isolated from other agricultural land making them likely to fall into disuse and ultimately resulting in further development.
- The development is likely to serve commuters from south of the Forth rather than local people.
- Fife will have to bear the cost of infrastructure and services with little long term economic benefit to the area.

Development on Proposal DUN039 along with Proposals DUN038 Kent Street, DUN044 Land to the north of Wellwood, DUN46 Chamberfield Road, DUN067 Northern Link Road, TWH001 Townhill Power Station Site and TWH002 Townhill Loch Car Park would largely enclose the country park impacting the wildlife in the park. Development on this site along with Proposals DUN044 Chamberfield and TWH001 Townhill Power Station Site would lead to the coalescence of Townhill and Wellwood which would have a negative impact on the Townhill community. This site should either remain as agricultural land or be absorbed into the country park.

### DUN040/41 Craigluscar Road/Carnock Road/North Dunfermline (Swallow Drum)

<table>
<thead>
<tr>
<th>Name</th>
<th>Count</th>
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</thead>
<tbody>
<tr>
<td>Alex MacLeod (60)</td>
<td></td>
</tr>
<tr>
<td>Douglas Morris (147)</td>
<td></td>
</tr>
<tr>
<td>Sandra Gilmour (793)</td>
<td></td>
</tr>
<tr>
<td>Beatrice Walker (1120)</td>
<td></td>
</tr>
<tr>
<td>Bennett Black (1127)</td>
<td></td>
</tr>
</tbody>
</table>

Object to the inclusion of site DUN040. B. Black’s property is situated within the red boundary as marked on the proposed plan. The surrounding fields are full of old mine workings. Concerned that any disturbance to the surrounding land would cause movement to property foundations and an underground septic tank.
There is already a problem with surface water; this scale of development could lead to significant flooding. There will be a diminution in property values. Further housing would increase traffic and congestion leading to further road safety issues. It is considered that there will be considerable disruption to existing properties during construction.

W M McInally (1460): Object to the inclusion of site DUN040. Ordnance Survey map of 1894-1895 (1:2500) OS Sheet XXXVIII.4 indicates the presence of two quarries within the proposed sites. Minutes of the Town Council confirms that this site was formerly used as a "refuse coup". This may result in excessive costs associated with preparing the site. Concerns that traffic congestion along Craigluscar Road will be exacerbated. How will traffic access the west side of town without the necessary road infrastructure?

Janek Matysiak (1493), S Baxter (1639): Object to the inclusion of site DUN040. Fife Council has failed to carry out a democratic process. Existing infrastructure in Dunfermline cannot cope without further development. This area has historic mine and quarry workings. The proposed development would have adverse impact on the environment and amenities. Fife Council has failed to ensure that existing strategic development sites are developed first. There will be significant disturbance during construction.

Iain Thomson (2047): Object to inclusion of site DUN040: This area has a vast amount of underground mining shafts. Electricity pylons run through the centre of the proposed area. There is a strong smell from the biomass plant which lies north. Loss of amenity and valuable open space.

SEPA (3374): Support Development Requirements for Flood Risk Assessment to be undertaken.

Milesmark & Baldridge Community Council (3727): The Community Council recognises that additional sites require to be identified through FIFEplan in order to comply with SESplan strategy. However, the Community Council is extremely concerned about how additional housing and other development can be accommodated without a substantial, co-ordinated and properly phased upgrading of the road network within and around Dunfermline. The Community Council is not aware that a mechanism has been agreed and put in place by Fife Council, which ensures that road construction and junction improvements will be implemented in tandem with housing and other developments in a co-ordinated and holistic way as part of the North Dunfermline Strategic Development Area. The Community Council requests that a fresh Strategic Transport Assessment is undertaken.

DUN041 North Dunfermline (Swallow Drum)

Campion Homes Ltd (849): Support inclusion of site DUN041. The identified sites (DUN040 Craigluscar Road/Carnock Road/DUN041/ DUN042 Carnock Road) are fully effective and would contribute positively to housing provision in order to meet identified requirements. The site is an appropriate form of sustainable development, representing a logical infill within the existing built form. The site can be developed as an initial phase of the larger SDA development and therefore make a positive contribution to early and much needed housing completions. It would be a fully integrated part of the larger development (DUN041/DUN042). For all of the reasons set out it is considered that the site should be allocated for residential development within the local development plan. 

(See submitted documents: Access Study Report, Figure 1 - Location/Site Plan and
Beatrice Walker (1124), Bennett Black (1128): Object to the inclusion of site DUN041. B. Black’s property is situated within the red boundary as marked on the proposed plan. The surrounding fields are full of old mine workings. Concerned that any disturbance to the surrounding land would cause movement to property foundations and an underground septic tank. There is already a problem with surface water; this scale of development could lead to significant flooding. There will be a diminution in property values. Further housing would increase traffic and congestion leading to further road safety issues. It is considered that there will be considerable disruption to existing properties during construction.

W M McInally (1461): Object to the inclusion of site DUN041. Ordnance Survey map of 1894-1895 (1:2500) OS Sheet XXXVIII.4 indicates the presence of two quarries within the proposed sites. Minutes of the Town Council confirms that this site was formerly used as a "refuse coup". This may result in excessive costs associated with preparing the site. Concerns that traffic congestion along Craigluscar Road will be exacerbated. How will traffic access the west side of town without the necessary road infrastructure?

Janek Matysiak (1494), S Baxter (1638): Object to the inclusion of site DUN041. Fife Council has failed to carry out a democratic process. Existing infrastructure in Dunfermline cannot cope without further development. This area has historic mine and quarry workings. The proposed development would have adverse impact on the environment and amenities. Fife Council has failed to ensure that existing strategic development sites are developed first. There will be significant disturbance during construction.

SEPA (3375): Support Development Requirements for Flood Risk Assessment, buffer strip along the watercourse and feasibility study to enable consideration of the potential for restoration and improvement of the water environment through the site design.

Milesmark & Baldridge Community Council (3726): The Community Council recognises that additional sites require to be identified through FIFEplan in order to comply with SESplan strategy. However, the Community Council is extremely concerned about how additional housing and other development can be accommodated without a substantial, co-ordinated and properly phased upgrading of the road network within and around Dunfermline. The Community Council is not aware that a mechanism has been agreed and put in place by Fife Council, which ensures that road construction and junction improvements will be implemented in tandem with housing and other developments in a co-ordinated and holistic way as part of the North Dunfermline Strategic Development Area. The Community Council requests that a fresh Strategic Transport Assessment is undertaken.

DUN042 Carnock Road

Andrew Gillies (144): Object to inclusion of DUN042. Access to the site from Carnock Road is unsuitable. There are potential flooding issues.

Campion Homes (851): Support inclusion of site DUN042. The identified sites (DUN040 Craigluscar Road/Carnock Road/DUN041 North Dunfermline (Swallow Drum)/DUN042) are fully effective and would contribute positively to housing provision in order to meet identified requirements. The site is an appropriate form of sustainable development,
representing a logical infill within the existing built form. The site can be developed as an initial phase of the larger SDA development and therefore make a positive contribution to early and much needed housing completions. It would be a fully integrated part of the larger development. For all of the reasons set out it is considered that the site should be allocated for residential development within the local development plan. (See submitted documents: Access Study Report, Figure 1 - Location/Site Plan and Figure 2 – Initial Access Strategy)

Jim Thomson (860): Support inclusion of site DUN042. In light of its location, form, lack of sensitive environment, limited visual impact, and deliverability, it is considered that the development of this site would be fully supported by SESplan, by Scottish Planning Policy and by the underlying aims and objectives contained within the emerging Local Development Plan, by adding to choice and variety in terms of location and properties.

Beatrice Walker (1125), Bennett Black (1129): Object to the inclusion of site DUN042. B.Black's is situated within the red boundary as marked on the proposed plan. The surrounding fields are full of old mine workings. Concerned that any disturbance to the surrounding land would cause movement to property foundations and an underground septic tank. There is already a problem with surface water; this scale of development could lead to significant flooding. There will be a diminution in property values. Further housing would increase traffic and congestion leading to further road safety issues. It is considered that there will be considerable disruption to existing properties during construction.

Janek Matysiak (1495), S Baxter (1641): Object to the inclusion of site DUN042. Fife Council has failed to carry out a democratic process. Existing infrastructure in Dunfermline cannot cope without further development. This area has historic mine and quarry workings. The proposed development would have adverse impact on the environment and amenities. Fife Council has failed to ensure that existing strategic development sites are developed first. There will be significant disturbance during construction.

Iain Thomson (2046): Support DUN042 and the proposed developments to the West of Dunfermline (DUN040 Craigluscar Road/Carnock Road, DUN041 North Dunfermline (Swallow Drum), DUN042) as this will help address the imbalance caused by the eastern expansion. Residents in this area may shop and engage with local businesses’ which will help to regenerate the town centre. There are good public transport links into town which will help reduce traffic congestion and ease the burden on town centre parking. A number of local businesses support this view.

Milesmark and Baldridge Community Council (3728): The Community Council recognises that additional sites require to be identified through FIFEplan in order to comply with SESplan strategy. However, the Community Council is extremely concerned about how additional housing and other development can be accommodated without a substantial, co-ordinated and properly phased upgrading of the road network within and around Dunfermline. The Community Council is not aware that a mechanism has been agreed and put in place by Fife Council, which ensures that road construction and junction improvements will be implemented in tandem with housing and other developments in a co-ordinated and holistic way as part of the North Dunfermline Strategic Development Area. The Community Council requests that a fresh Strategic Transport Assessment is undertaken. In terms of Proposal Site DUN042 the Community Council want to ensure that part of the site between 42c and 42d Carnock road is only
available as a footpath/cycleway access with appropriate landscaping.

**DUN043 Halbeath**

John Gunn (55): Object to inclusion of DUN043 as a housing site. Object to further housing being built in this area because the open spaces are a major attraction. Concerns about further traffic (including construction traffic) given the quality of existing accesses.

Kingsseat Community Council (359): Object to inclusion of DUN043. Concern over presence of mine workings and pipe line. Also concerned about additional traffic and worry that much of it will avoid the congestion of Halbeath by going through Kingseat. The increase in traffic will add to the dangers for pedestrians and cyclist in the Kingseat area. Also concern that the infrastructure will not cope - especially schools and medical services, and concern is expressed over the loss of prime agricultural land.

Robert Hutchinson (425), Watson Wilson (399), A Shread (398), Walter Sinclair (403), W H Ramsay (405), T Hogg (408), Steven Liddle (416), Alexander Lees (417), Sheena Keenan (420), Sandra Stothard (422), Alexander Whyte (424), S R Hutchison (428), Allyson Fawcett (432), R Stuart (433), R R H Darce (437), Andrew Penman (440), Anne Clayton (447), R Miller (446), Peter McNamee (451), Peter Fawcett (455), Paula Gregory (457), Leslie Smith (490), Margaret Haewood (470), Michael Scanlin (462), Margaret Crawford (473), Malcolm Mackay (478), M Shread (482), June Greig (491), Wilma Donaghy (493), K Donaghy (495), Laura Wiseman (497), Laura Maconachie (522), Kathleen Campbell (525), Joan Spowart (527), Jeff Wiseman (529), Janette Wiseman (530) Jacqueline Welsh (532), Janet Fisher (534), J Whyte (537), Julie Millar (539), J McLure (540), J M Stothard (542), Ian Todd (544), Helen McClure (547), Grace Scanlin (549), George Campbell (551), G Johnstone (553), Forbes N Stuart (555), Fiona Dacre (557), E A Lamond (560), Duncan Fisher (562), Doreen Esnol (566), Donald Gregory (570), Dawn Proudfoot (580), B W Glover (576), Claire Richardson (583), Claire Henderson (585), Claire Beurskens (587), Carol Smith (589), C Lees (591), C Crawford (593), Brian Crawford (595), Andrew Glass (627), Babara Sands (598), Jan Lawrence (606), Syme (731), Margaret Bingham (1132), L Bingham (1130), Steven Lawrence (868), Colin R White (1079), Gillian Grant (1080), Mr & Mrs A Marshall (1135), Muriel Nicol (1138), Robert Nicol (1142), J & Margaret Digance (1259), William Henderson (1598), Karen Galbraith (1945), D Keningale (2374), Ean Galbraith (2395), Norman Woolley (2405), Patricia Wooley (2411), Lynne Fergusson (973), Martin Moody (2068), Halbeath & Duloch Community Council (2719), Owner/Occupier (3865), R Keningale (3925): Object to inclusion of DUN043 as a housing site. Fife Council has failed to carry out the democratic process involving consultation with local communities. Sufficient notice has not been given to submit comment on the Fifplan through poor notification/advertising of planning documentation. Fife Council and developers have not done a full assessment of the site to prove the site is suitable for proposed development, e.g. old mine workings, water tables and adjacent gas pipelines. The development of this proposed site should not be approved until the Northern Relief Road is completed, otherwise the traffic problems in Kingsseat and surrounding areas will be exacerbated further. Access to and from development onto minor roads will create dangerous traffic conditions. Further stretching of local infrastructure e.g. schools, medical & shops. Further concerned about the use of prime agricultural land to build housing overspill for Edinburgh before existing strategic housing developments are delivered first.
Halbeath Residents and Tenants Association (1807, 3752): Object to inclusion of DUN043, which does not have the support of this community. The plan has been slipped through with the minimum of public consultation and a complete failure to properly assess the site or to fully address the justifiable concerns of the public. The Association believes the whole assessment and consultation process on FIFEplan has been inadequate and the decision reached by Fife Council at its meeting on 9th September 2014 is flawed and may even breach legislation. We request that the decision of the Council to approve FIFEplan and DUN043 in particular is set aside and the assessment and consultation process restarted to include full and open discussion with all of the affected communities.

Alex Allan (381) (384): Accept that the proposed development will go ahead due to the requirement for further housing.

Gordon Hill (770), John Jenkins (775), D Callander (766), Elizabeth McKay (747), Ross McKay (750), Lindsay McKay (753), Patricia Brown (757), T Hamilton (762), J M Watson (780), Alison & Steven Rodger (787), Sheona Richmond (790), J Atherton (1083), Jennifer Forrester (1086), Mary Braid (1089), Samantha Steven (1092), Arthur Baird (1006), Graham A Black (1019), Ian Pollock (1039), Sylvia Greig (1099), Thomas Greig (1102), Tracey Coll (1105), Gordon Horn (1108), J W Williamson (1111), Ken & Grace Nicoll (1115), Sheila Robinson (1118), Thomas P Graham (1122), John Gunn (2452), Lynne Ferguson (2487), A Guille (2439), Terry Guille (2444), Lorraine Guile (2448), Stacey Gunn (2455), T Inglis (2462), Alison Inglis (2466), Esther Wren (2469), Margaret Thomson (2474), Graham Suaden (2480), Margaret Waterston (2483), Joanne Crumley (2490), Darren Berry (2497), Sandra McKenzie (2503), Alex McKenzie (2507), Tom Gibson (2513), Susan Wallace (2539), J Fyfe (2543), Christine Wallace (2548), Archie Ferguson (2552), R Ferguson (2556), David Kerr (2560), Anne Kerr (2564), Joan Davidson (2569), Ella Coates (2595), Barbara Waller (2837), David Adamson (2840), Carol Adamson (2845), T P Waller (2851), Elizabeth Glennie (2849), Pamela Wilson (2856), Irene Wilson (2864), Andrew S Wilson (2870), Michael J Chadfield (2877), Sheila A Chadfield (2885), Nancy Ray (2894), Mark Sherry (2905), Lorraine Harvey (2910), S Lawrence (2921), Janis Lawrence (2956), Carolyn Kinnear (2963), Patricia Breary (2968), David Breary (2972), Isabella Saunders (2977), Terry Tally (2981), Karen Tomlinson (2984), Mary Tully (3008), James Forbes (3011), Mark Monaghan (3032), James Spalding (3040), David McLean (3063, 3896), Anne Forbes (2989), Matthew Forbes (2995), Janet McPherson (3003), Kevin Cummings (3014), Steve McLean (3029), Sharon Monaghan (3035), Elaine Spalding (3043), Mrs E McLean (3053), Sheila Malpas (3069), Lisa Malpas (3079), Mary Simpson (3095), David Stubbs (3193), Kenneth Walker (3104), Steven Bowman (3109), Sharon Easton (3115), Jean Tait (3124), Rachel Thomson (3131), Aileen Emms (3190), James Leggate (3197), Michael J Emms (3224), Lorna Clark (3180), Pamela Paxton (3185), Kevin Searle (3241), Christine Clyde (3262), Barbara Inglis (3272), Callum Dewar (3288), Catherine Brownlee-Noble (3428), Elizabeth Bailey (3432), Gail Hogg (3436), Ian Harper (3444), Irene Marshall (3464), Janet Brown (3470), Janet Sauderson (3486), Lee McLean-Marshall (3506), Norman Ainslie (3527), Mrs J Nicol (3532), Jane Ainslie (3537), Niall Frame-Noble (3595), Robert Lowes Noble (3598), Steven Inglis (3603), Stuart Nicol (3606), V Richardson (3610), Graeme Whyte (3621): Object to FIFEplan. DUN043 should not be approved by the council until after the Dunfermline Northern Relief Road is built. Current flooding issues on the southern edge of the Queen Margaret estate will be exacerbated by development.
<table>
<thead>
<tr>
<th>Name</th>
<th>Comment</th>
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<tbody>
<tr>
<td>Gordon Harvey (660), Simon Owen (718)</td>
<td>Fife Council has not allowed the full six weeks for us to consider the issues. The plan included within the consultation documents sent to me shows a development which encompasses property which is in common ownership with my neighbours. Part of the site is not in the developer's ownership. The SEA is very sparse in its assessment of any environmental criteria for this site with many assumptions being used to justify proceeding with the designation. Fife Council should not have agreed a plan for housing without ensuring detailed plans and timetable for the Northern Relief road. North Dunfermline development areas have all been driven by the developers. This will result in a sporadic and potentially inappropriate development.</td>
</tr>
<tr>
<td>Bellyeoman Community Council (755)</td>
<td>Object to inclusion of DUN043. Lack of phased infrastructure, especially schools, is of concern. A detailed education assessment is required. Concerns regarding the increase in traffic using feeder roads from the North to the shopping centres, town Centre and work places in Dunfermline. The Relief Road will not be the answer to traffic congestion on already busy feeder roads like Whitefield Road, Townhill Road and Halbeath Road. Concerned that funding dependent on the trickle down of money from section 75 agreements over a number of years will not ensure that the Link Road is completed in advance of housing developments. A Flood Risk Assessment is required. A Coal Authority referral for a risk assessment of the site is also required.</td>
</tr>
<tr>
<td>William McCulloch (759), Cristopher McCallum (1239)</td>
<td>Object to inclusion of site for 1400 units at DUN043. Scope for some additional housing in the area but this should be on a much smaller scale preserving existing communities. There is a need for such a substantial increase in housing in Dunfermline? There are two main concerns about the specific proposals for Site DUN043, (i) capacity at local schools and (ii) the impact of the increased traffic.</td>
</tr>
<tr>
<td>Sue Bateson (1686)</td>
<td>Object to inclusion of DUN043 due to its impact on the local community in terms of services, traffic congestion, and impact on the environment and house values.</td>
</tr>
<tr>
<td>SEPA (3376)</td>
<td>Support Development Requirements for a Flood Risk Assessment and a buffer strip along the watercourse.</td>
</tr>
<tr>
<td>Taylor Wimpey (3694)</td>
<td>Support the inclusion of DUN043. The proposal is in a sustainable location. The site has the landscape capacity to accommodate the scale of development proposed. Its approval will assist the Council meet its housing land requirement, helping maintain a 5 year effective housing land supply as required by SESplan and Scottish Ministers. It is expected that the proposal will build 72 homes per annum with two house builders on site and could potentially increase to 108 completions per annum if three house builders are on site.</td>
</tr>
<tr>
<td>DUN044 Land to the north of Wellwood</td>
<td>Omnivale Ltd (1888): Omnivale Ltd support the inclusion of DUN044. The site has a capacity for more than 100 units. Demand in this location is likely to be strong for small/medium scale sized housing and the site has capacity for 140-150 dwellings.</td>
</tr>
<tr>
<td>Omnivale Ltd (3377)</td>
<td>Support Development Requirements for Flood Risk Assessment, buffer strip along the watercourse and feasibility study to enable consideration of the potential for restoration and improvement of the water environment through the site design.</td>
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</tbody>
</table>
DUN045 Rosegreen, Carnock Road

Campion Homes Ltd (1213): Object to inclusion of site DUN045. It is imperative that allocated land comprise logical, supportable and defensible extensions to Dunfermline. The proposed site allocation at Rosegreen, Carnock Road appears as an unwarranted intrusion into an area of attractive countryside at the settlement edge, an intrusion which appears illogical and which will directly lead to pressure on immediately adjacent land for further expansion.

Janek Matysiak (1496): Object to inclusion of site DUN045. Dunfermline cannot cope with more houses in relationship to its amenities. Fife Council failed to carry out a democratic process, the information about to how to object has not been widely publicised. During the building process there will be a considerable amount of environmental, noise, traffic impact on the community. 100 Households squeezed into this small area will only add to the already congested roads at peak times.

S Baxter (1642): Object to the inclusion of DUN045. Insufficient proof that site is suitable for development – historic mine and quarry sites around this area have not been fully considered. There is local flooding. Local roads will experience more congestion. The building process will also impact on traffic and environment. Further Fife Council has failed to ensure existing approved strategic housing developments are delivered first.

Milesmark and Baldridge Community Council (3729): The Community Council recognises that additional sites require to be identified through FIFEplan in order to comply with SESplan strategy. However, the Community Council is extremely concerned about how additional housing and other development can be accommodated without a substantial, co-ordinated and properly phased upgrading of the road network within and around Dunfermline. The Community Council is not aware that a mechanism has been agreed and put in place by Fife Council, which ensures that road construction and junction improvements will be implemented in tandem with housing and other developments in a co-ordinated and holistic way as part of the North Dunfermline Strategic Development Area. The Community Council requests that a fresh Strategic Transport Assessment is undertaken. In terms of Proposal Site DUN042 Carnock Road, Milesmark and Baldridge Community Council want to ensure that part of the site between 42c and 42d Carnock road is only available as a footpath/cycleway access with appropriate landscaping. It should not be made available as a vehicular access onto Carnock Road. In terms of site DUN045, the Community Council consider that it is not well integrated into the existing urban area and it will not integrate well with the other proposal sites within this part of Dunfermline.

SEPA (3378): Support Development Requirements for Flood Risk Assessment and buffer strip along the watercourse.

DUN046 Chamberfield Road

Townhill Community Council (638): Object to the inclusion of DUN046. Development of this site would result in undue pressure on Townhill Primary School roll and transport issues.

Robert Peattie (31, 274): Object to inclusion of sites DUN038 Kent Street and DUN046 as they appear to directly oppose or contradict the conclusions reached from the
consultation for the Development Plan Strategy Dated Dec 2013 (see CD 13).

Fiona McCreadie (267), Raymond Pringle (485), Nuala Connelly (733), Tim Stanford (892): The development would lead to coalescence between Townhill and Dunfermline and hence the loss of the village identity. Along with other development proposals at Chamberfield and Colton, it would have a significant impact on Townhill Primary School, taking it beyond its current capacity limit. It would produce a significant increase in traffic on already heavily used roads with major junction constraints, leading to more traffic, to an unacceptable level. It would also have a detrimental effect on the Country Park and its wildlife.

Alan Gray (774), Sally Gray (959): Object to the proposed developments at DUN038 Kent Street and DUN046. Adverse effect on the residential amenity of neighbours e.g noise, disturbance, overlooking, loss of privacy, overshadowing, and drainage concerns. In addition, overdevelopment of the site, visual impact of the development, effect of the development on the character of the neighbourhood. The development would adversely affect highway safety or the convenience of road users on Townhill Road, the junction at Chamberfield Road and the areas surrounding Townhill Road. Concerns about impact on access to our property during development and beyond. Wildlife in the area would be affected. Local primary and secondary schools would not be able to cope. Fife Council and developers have not done a full assessment of the site to prove the site is suitable for proposed development, e.g. old mine workings, water tables and adjacent gas pipelines.

Cliff Dudley (2290), Angela Dudley (2293), Pamela Parker (2295), Gail Robertson (2297), Tom Minogue (2298), Agnes Minogue (2299), David Lyth (2301), Helen Lyth (2303), Drew Mitchell (2306), Nan Allen (2308), John Allen (2310), Jean Bullard (2312), Andrew Sim (2313, 2608, 1751), Vicky Harrison (2314): Object to the proposed developments at DUN038 Kent Street and DUN046. The new developments at Kent Street and Chamberfield will almost double Townhill's housing area, and perhaps population. This is devastating for a community. It will increase the pressure on Townhill Road, which is already impassable when large vehicles are using it.

Logie & Pittencrieff Estate (1204): Support the allocation of DUN046. There are considered to be no known environmental, infrastructure, educational, access or other constraints which would affect the suitability of the subject site for housing. The site, subject to a Local Development Plan allocation, is capable of delivering housing within the first 5 year period of the Local Development Plan. The site can provide for the early delivery of part of the SESplan North Dunfermline SDA allocation (with the neighbouring site) and therefore positively contribute towards the delivery of the SESplan and FIFEplan development strategy. (See submitted documents: 1.Indicative Site Layout, 2. Indicative Site Layout with neighbouring site, 3.Transport Statement, and 4.Townhill Primary School Catchment Plan).

Townhill Community Council (638): Request sight of the updated Transport Assessment due in 2015 and reassurance that the route of the Northern Relief Road is to be reconsidered; and an impact assessment on the school capacity for Townhill Primary School should be undertaken, or remove site DUN046 from the plan.

SEPA (3380): Support Development Requirements for Flood Risk Assessment and the inclusion of buffer strip along the watercourse.
David Croft (3883): Objects to Proposal DUN046 on the following grounds:

- The development would encroach on Townhill Country Park, impacting on leisure activities in the park and access to the park by pedestrians and cyclists from Chamberfield Road and reducing the attractiveness of the park to visitors.
- Impacts of increased traffic (including construction traffic) creating noise, congestion, air pollution and increased risk of accidents.
- Access along Chamberfield Road is impractical given the width of the road, on street parking and the spacing of the tress. The woodland nature of this access to Townhill Loch should be preserved.
- Adverse impact on wildlife.
- Increased flood risk downstream and to the north west (adjacent to the watercourse) and impact on the sewage system.
- Townhill primary school has insufficient capacity for growth.
- Capacity of health and dental facilities is already an issue in the area.
- The site includes garden ground of an existing house (Chamberfield).
- Loss of valuable agricultural land and the two fields remaining to the south and south west of Townhill Loch will be isolated from other agricultural land making them likely to fall into disuse and ultimately resulting in further development.
- The development is likely to serve commuters from south of the Forth rather than local people.
- Fife will have to bear the cost of infrastructure and services with little long term economic benefit to the area.
- Given the challenges of the slope, flood exclusion zones and restriction on development within 10m of woodland the development proposed would be at a higher density than the surrounding areas. This indicates that it may be flatted development which would be out of keeping with the surrounding area.
- Planning permission for the site has been previously refused by a Scottish Reporter, nothing has changed that would support development on this land.
- The 10m exclusion zone for the TPO trees is inadequate given the height of the trees a 20m buffer would be more appropriate.

**Modifications sought by those submitting representations:**

### Dunfermline Strategic Development Areas

**Scottish Natural Heritage (898):** A Development Framework is required to set the direction for effective delivery of development within the Strategic Development Area.

**Omnivale Ltd. (1891):** Delete the reference to “health care facilities” from the plan in relation to DUN044 Land to the north of Wellwood. Delete reference to "local shops" from the plan in relation to site DUN044.

**DUN035 Dunfermline N/W/SW**

**Christine Johnston (1244), Hugh Johnston (1246), Rose Johnston (1251):** Remove DUN035 from the plan. Prevent Lady Nairnie Drive from being used to access new development.

**Stirling Developments (3680):** Neighbourhood-wide combined heat and power (CHP) systems’ and ‘recycling facilities’ are referenced twice under ‘development requirements’
for Site DUN 035. One of each of these bullet points should be deleted from the Proposals Table.

**DUN038 Kent Street**

Townhill Community Council (634): Request sight of the updated Transport Assessment due in 2015 and reassurance that the route of the Northern Relief Road (NRR) is to be reconsidered; an impact assessment on the school capacity for Townhill Primary School should be undertaken; and revised proposals to ensure coalescence does not “creep” between Townhill and Dunfermline by the development of this site and the Townhill Car Park (TWH002), or remove site DUN038 from the plan.

Robert Peattie (30, 275), Alan Gray (776), Sally Gray (996), Raymond Pringle (483), Lindsay Spence (507), Linda Cowan (624), Maria Smeaton (671), Nuala Connelly (734), Christine Oliver (820), Gemma Nicolson (1327), Craig Anderson (1793), Paul Munro (1839), Cliff Dudley (2316), Angela Dudley (2319), Pamela Parker (2320), Gail Robertson (2321), Tom Minogue (2323), Agnes Minogue (2325), David Lyth (2326), Helen Lyth (2327), Drew Mitchell (2328), Nan Allen (2330), John Allen (2331), Jean Bullard (2332), Andrew Sim (2333, 2608), Vicky Harrison (2315), David Croft (3870): Remove site DUN038 from the plan.

**DUN039 North Dunfermline (Colton)**

Kingseat Community Council (635): Clarity is sought on the transport and schools issues.

Raymond Pringle (484), Maria Smeaton (672), Gemma Nicolson (1328), David Croft (3882): Remove site DUN039 from the plan.

**DUN040/41 Craigluscar Road/Carnock Road/North Dunfermline (Swallow Drum)**

DUN040 Craigluscar Road/Carnock Road

Alex MacLeod (60), Douglas Morris (147), Sandra Gilmour (793), Beatrice Walker (1120), Bennett Black (1127), W M McInally (1460), Janek Matysiak (1493), S Baxter (1639), Iain Thomson (2047): Remove site DUN040 from the plan.

Milesmark & Baldridge Community Council (3727): A new Strategic Transport Assessment should be prepared before this site is included in the plan.

**DUN041 North Dunfermline (Swallow Drum)**

Beatrice Walker (1124), Bennett Black (1128), W M McInally (1461), Janek Matysiak (1494), S Baxter (1638): Remove site DUN041 from the plan.

Milesmark & Baldridge Community Council (3726): A new Strategic Transport Assessment should be prepared before this site is included in the plan.

**DUN042 Carnock Road**

Andrew Gillies (144), Beatrice Walker (1125), Bennett Black (1129), Janek Matysiak (1495), S Baxter (1641): Remove site DUN042 from the plan.
Milesmark and Baldridge Community Council (3728): The development should not proceed until a new Dunfermline Transport Assessment is undertaken. If the site is developed then the access between 42c and 42d Carnock road should not be vehicular.

DUN043 Halbeath

Kingseat Community Council (359), Robert Hutchinson (425), Watson Wilson (399), A Shread (398), Walter Sinclair (403), W H Ramsay (405), T Hogg (408), Steven Liddle (416), Alexander Lees (417), Sheena Keenan (420), Sandra Stothard (422), Alexander Whyte (424), S R Hutchinson (428), Allyson Fawcett (432), R Stuart (433), R R H Darce (437), Andrew Penman (440), Anne Clayton (447), R Miller (446), Peter McNamee (451), Peter Fawcett (455), Paula Gregory (457), Leslie Smith (490), Margaret Haewood (470), Michael Scanlin (462), Margaret Crawford (473), Malcolm Mackay (478), June Greig (491), Wilma Donaghy (493), K Donaghy (495), Laura Wiseman (497), Laura Maconachie (522), M Shread (482), June Greig (491), Wilma Donaghy (493), K. Donaghy (495), Laura Wiseman (497), Laura Maconachie (522), Kathleen Campbell (525), Joan Spowat (527), Jeff Wiseman (529), Janette Wiseman (530) Jacqueline Welsh (532), Janet Fisher (534), J Whyte (537), Julie Millar (539), J McClure (540), J M Stothard (542), Ian Todd (544), Helen McClure (547), Grace Scanlin (549), George Campbell (551), G Johnstone (553), Forbes N Stuart (555), Fiona Dacre (557), E A Lamond (560), Duncan Fisher (562), Doreen Esnol (566), Donald Gregory (570), Dawn Proudfoot (580), B W Glover (576), Claire Richardson (583), Claire Henderson (585), Claire Beurskens (587), Carol Smith (589), C Lees (591), C Crawford (593), Brian Crawford (595), Andrew Glass (627), Babara Sands (598), Jan Lawrence (606), Syme (731), Margaret Bingham (1132), L Bingham (1130), Steven Lawrence (868), Colin R White (1079), Gillian Grant (1080), Mr & Mrs A Marshall (1135), Muriel Nicol (1138), Robert Nicol (1142), J & Margaret Digance (1259), William Henderson (1598), Karen Galbraith (1945), D Keningale (2374), Ean Galbraith (2395), Norman Woolley (2405), Patricia Wooley (2411), Lynne Ferguson (973), Martin Moody (2068), Halbeath & Duloch Community Council (2719), Owner/Occupier (3865), R Keningale (3925), John Gunn (55) (2452), Gordon Hill (770), John Jenkins (775), D Callander (766), Elizabeth McKay (747), Ross McKay (750), Lindsay McKay (753), Patricia Brown (757), T Hamilton (762), J M Watson (780), Alison & Steven Rodger (787), Sheona Richmond (790), J Atherton (1083), Jennifer Forrester (1086), Mary Braid (1089), Samantha Steven (1092), Arthur Baird (1006), Graham A Black (1019), Ian Pollock (1039), Sylvia Greig (1099), Thomas Greig (1102), Tracey Coll (1105), Gordon Horn (1108), J W Williamson (1111), Ken & Grace Nicol (1115), Sheila Robinson (1118), Thomas P Graham (1122), Lynne Ferguson (2487), A Guille (2439), Terry Guile (2444), Lorraine Guile (2448), Stacey Gunn (2455), T Inglis (2462), Alison Inglis (2466), Esther Wren (2469), Margaret Thomson (2474), Graham Suaden (2480), Margaret Waterson (2483), Joanne Crumley (2490), Darren Berry (2497), Sandra McKenzie (2503), Alex McKenzie (2507), Tom Gibson (2513), Susan Wallace (2539), J Fyfe (2543), Christine Wallace (2548), Archie Ferguson (2552), R.Ferguson (2556), David Kerr (2560), Anne Kerr (2564), Joan Davidson (2569), Ella Coates (2959), Barbara Waller (2837), David Adamson (2840), Carol Adamson (2845), T P Waller (2851), Elizabeth Glennie (2849), Pamela Wilson (2856), Irene Wilson (2864), Andrew S Wilson (2870), Michael J Chadfield (2877), Sheila A Chadfield (2885), Nancy Ray (2894), Mark Sherry (2905), Lorraine Harvey (2910), S Lawrence (2921), Janis Lawrence (2956), Carolyn Kinneary (2963), Patricia Breary (2968), David Breary (2972), Isabella Saunders (2977), Terry Tally (2981), Karen Tomlinson (2984), Mary Tully (3008), James Forbes (3011), Mark Monaghan (3032), James Spalding (3040), David McLean (3063, 3896), Anne Forbes (2989), Matthew Forbes (2995), Janet McPherson (3003), Kevin Cummings (3014),
Steve McLean (3029), Sharon Monaghan (3035), Elaine Spalding (3043), Mrs E McLean (3053), Sheila Malpas (3069), Lisa Malpas (3079), Mary Simpson (3095), David Stubbs (3193), Kenneth Walker (3104), Steven Bowman (3109), Sharon Easton (3115), Jean Tait (3124), Rachel Thomson (3131), Aileen Emms (3190), James Leggate (3197), Michael J Emms (3224), Lorna Clark (3180), Pamela Paxton (3185), Kevin Searle (3241), Christine Hyde (3262), Barbara Inglis (3272), Callum Dewar (3288), Catherine Brownlee-Noble (3428), Elizabeth Bailey (3432), Gail Hogg (3436), Ian Harper (3444), Irene Marshall (3464), Janet Brown (3470), Janet Saunderson (3486), Lee McLean-Marshall (3506), Norman Ainslie (3527), Mrs J Nicol (3532), Jane Ainslie (3537), Niall Frame-Noble (3595), Robert Lowes Noble (3598), Steven Inglis (3603), Stuart Nicol (3606), V Richardson (3610), Graeme Whyte (3621), Sue Bateson (1686): Remove housing site DUN043, or ensure that the Dunfermline Northern Relief Road is built before its approval.

Bellyeoman Community Council (755): Remove housing site DUN043. A detailed education assessment is requested. A Flood Risk Assessment is required. A Coal Authority referral for a risk assessment of the site is also required.

Halbeath Residents and Tenants Association (1807, 3752): Remove housing site DUN043.

Alex Allan (381, 384): Request that the conditions that will be put in place at the start of each phase should be met in full before progressing to the next phase, in particular the completion and maintenance of the landscaped areas within the development. Also request that a circular landscaped pathway complete with access/egress points from all around the new development, including the Pleasance Road track. The layout of this development should be presented for consultation to the local communities before any planning application is granted.

Gordon Harvey (660), Simon Owen (718): Remove all North Dunfermline sites until a proper strategic master plan is developed. Amend the plan to remove land not in the developers ownership.

William McCulloch (759), Cristopher McCallum (1239): Significantly fewer houses should be built.

DUN044 Land to the north of Wellwood

Omnivale Ltd (1888): Request that the estimated capacity of the site is increased to 150 units.

DUN045 Rosegreen, Carnock Road

Campion Homes Ltd (1213), Janek Matysiak (1496), S Baxter (1642), Milesmark and Baldridge Community Council (3729): Remove site DUN045 from the plan.

DUN046 Chamberfield Road

Townhill Community Council (638): Request sight of the updated Transport Assessment due in 2015 and reassurance that the route of the Northern Relief Road is to be reconsidered; and an impact assessment on the school capacity for Townhill Primary School should be undertaken, or remove site DUN046 from the plan.
Summary of responses (including reasons) by planning authority:

Note: Where a number of representations were received to sites a conjoined response has been prepared covering the various issues raised within the individual representations.

Dunfermline Strategic Development Areas

The requirement for, and benefit of, an overall Development Framework for the Strategic Development Area (SDA) is not considered necessary. It is considered that the delivery of the North Dunfermline SDA could be provided within the requirements set out in the local plan’s policies and proposals, implemented alongside Fife Council Making Fife’s Places draft Supplementary Guidance (CD51) and the Planning Obligations Framework (CD46).

The Local Development Plan (CD5, page 71) lists “detailed requirements to include …Community facilities including health care and local shops.” This list is written to cover all of the sites included in the North Dunfermline Strategic Development Area. It is not intended that each site will provide health care and local shops; however, there will be a requirement for the larger sites to do this.

DUN035 Dunfermline N/W/SW

The N/W/SW Dunfermline SDA is a proposal in the adopted Dunfermline & West Fife Local Plan 2012 (CD8, pages 53- 59 and Proposal DUN085, page 81). It comprises of three separate sites, known as Wellwood (N), Berrylaw (W) and Broomhall (SW).

Wellwood (1085 units) - 13/03683/EIA was submitted by I & H Brown in December 2013. Planning permission in principle has been approved for residential development, employment land, neighbourhood centre, primary school, open space areas including an urban park, path and cycle network and associated works (25/03/15) (see SD1). The development will provide a section of, and contribute to, the Northern Link Road. The application conforms to the Development Plan. Note - There is no proposal to extend Lady Nairne road for vehicular access to the Wellwood site.

Berrylaw (665 units) - Pittencrieff Estate has recently indicated its continued commitment to developing land at Berrylaw. The Estate intends to submit a statement of its intention and possible timescale/programming. The proposed development will provide a section of, and contribute to, the Western Distributor.

Broomhall (2450 units) – 15/01336/SCR: Broomhall SDA - EIA Screening Request submitted (08/04/15) on behalf of Broomhall Home Farm Partnership. Stirling Developments has demonstrated its commitment to developing at Broomhall through ongoing dialogue with Fife Council. The proposed development will provide a section of, and contribute to, the Western Distributor and provide a new primary school.
Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision.

Neighbourhood-wide combined heat and power (CHP) systems’ and ‘recycling facilities’ are referenced twice under ‘development requirements’ for Site DUN 035. One of each of these bullet points should be deleted from the Proposals Table. This has been recorded as a correction to be made in the adopted version of the Plan.

DUN038 Kent Street

This site is allocated in the Proposed Local Development Plan (see CD5). It is proposed for residential development as part of the North Dunfermline Strategic Development Area. The FIFEplan strategy for Dunfermline is to develop a sub-regional strategy for North Dunfermline (see Issue 3B Spatial Strategy). The provision of the Northern Link Road will provide access opportunities to this site and adjoining Chamberfield. The Northern Link Road should also help to integrate this area into the Dunfermline settlement. Strategic transport issues are being addressed by the FIFEplan Strategic Transport Appraisal (STA) (CD19). Individual proposals will be subject to traffic assessments which will identify measures and interventions required to make development proposals acceptable in terms of traffic impact.

Fife Council’s Planning Obligations Framework (March 2015) (see CD46) provides guidance on how developers are required to fund community infrastructure when this is needed as a result of new housing or commercial activity. FIFEplan requires developer investment in new roads and schools. Fife Council is also continuing to fund infrastructure through the approved Capital Plan and by exploring new funding mechanisms. This includes strategic transport interventions such as the Northern Link Road, where each developer along its route will be required, through planning conditions, to provide a section of the road through their site.

Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision. Site assessments undertaken in preparing the proposed plan were consistent with an assessment framework which considered issues such as the impact on landscape, settlement character, and infrastructure (CD 15).

Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with under the Homes Schedule 4 Issue 2B and its associated supporting paper.

Potential adverse landscape impacts, particularly on the adjoining Country Park, will need to be addressed as part of any future planning application. Green Network Priorities are identified for the site, including access functions to the park. A Flood Risk Assessment will be required.
The site sits within the catchment area of Townhill Primary School / St. Margararet’s RC Primary School and Queen Anne High School/ St. Columba’s RC High School. There is currently some capacity available in both secondary schools and limited capacity in both primaries. The developers of proposed North Dunfermline Strategic Development Area will, however, be required to provide two new primary schools and make contributions towards a secondary school if required ((CD46 – Planning Obligations Table 7).

To reduce the potential risk of coalescence between Townhill and Dunfermline, proposal TWH 002 - Townhill Loch Car Park, allocated as an employment site, could be removed from the plan. The former car park site, which sits out with but immediately adjacent to Townhill, was allocated as a brownfield opportunity site in the Dunfermline & West Fife Local Plan (CD 8, page 144), the preferred use being employment. The Proposed Plan (CD 5, page 81) continues to identify the site for employment; however Fife’s Employment Land Schedule 2014 (FELS) (CD18) no longer identifies the site as required for employment. Taking all of this into account, Fife Council considers that there is merit in removing the employment designation from TWH 002 and invites the Reporter to make an appropriate recommendation on this issue.

Representation (3870) states that planning permission for the site has been previously refused by a Scottish Reporter. There is no record of any planning appeals. However, the site was considered by a Reporter as part of the Examination on the Dunfermline & West Fife Local Plan (see CD 21).

The site assessments on biodiversity carried out for FIFEplan identified requirements for 10m buffer zones adjacent to areas of woodland to mitigate against potentially adverse impacts of development. It is considered that a buffer zone of 10m would provide sufficient protection for woodland in most cases and that the 20m buffer zone suggested would be unreasonable. The requirement for a 10m buffer zone adjacent to habitat such as woodland is set out in the draft Supplementary Guidance “Making Fife’s Places” (see CD 51, page 17). However, more detailed consideration/assessment would form part of the planning application process.

DUN039 North Dunfermline (Colton)

This site is included in the Proposed Local Development Plan for 300 houses. It forms part of a larger allocation (390 ha), outwith Dunfermline, which includes expansion of Townhill Country Park to form a leisure hub, with supporting Tourism/Hotel/Leisure. The housing site forms part of the North Dunfermline Strategic Development Area (see Issue 3B Spatial Strategy). Development of the site will deliver part of the Northern Link Road. Strategic transport issues are being addressed by the FIFEplan Transport Appraisal (CD19). Individual proposals will be subject to traffic assessments which will identify measures and interventions required to make development proposals acceptable in terms of traffic impact.

Housing will only be built on the south western part of the housing site to protect and integrate with the green network on the eastern edge. Green Network Priorities are identified for the site in the Proposed Plan (CD 5, page 72). A Flood Risk Assessment will be required. The provision of combined Heat & Power facilities will be encouraged. Individual proposals will be subject to traffic assessments which will identify measures and interventions required to make development proposals acceptable in terms of traffic impact.
The site sits within the catchment area of Townhill Primary School/ McLean Primary School/St Margaret’s RC Primary School and Queen Anne High School/St Columba’s RC High School. There is currently some capacity available in both secondary schools and limited capacity in both primaries. The developers of proposed North Dunfermline Strategic Development Area will, however, be required to provide two new primary schools and make contributions towards a secondary school if required (CD 46 – Planning Obligations, Table 7).

DUN040/DUN041/DUN042 Craigluscar Road/Carnock Road/North Dunfermline (Swallow Drum)/Carnock Road

The site/s are proposed for residential development as part of the North Dunfermline Strategic Development Area (see Issue 3B Spatial Strategy). Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies in infrastructure have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision. A new primary school will be provided on the site (see CD5 FIFEplan, Policy 4, page 206, Figure 4.1).

A Strategic Transport Assessment (STA) is being commissioned to look at wider impacts on the trunk road network. The STA has been arranged in discussion with Transport Scotland and with input from Transportation and Environmental Services. It is expected that the information from this will inform development obligations and should be available ahead of the Plan Examination in 2015.

Individual proposals will be subject to traffic assessments which will identify measures and interventions required to make development proposals acceptable in terms of traffic impact.

Development of the site will deliver part of the Northern Link Road
Site investigations and and Engineering Constraints Report will be required at the masterplan and planning application stages. Any ground condition constraints will need to be remediated prior to development.

Green Network Priorities are identified for the site/s (CD 5 FIFEplan, Settlement Plans, pages 72-73).

Policy 4 Planning Obligations of FIFEplan (CD5 pages 204-206) sets out the requirements for all new development in which the Council will seek appropriate contributions from developers towards adequate infrastructure. The Council will seek either the direct provision of requirements by developers or contributions towards their cost if these are to be provided by others.

Ordnance Survey map of 1894-1895 (1:2500) OS Sheet XXXVIII.4 indicates the presence of two quarries within the proposed sites.

DUN043 Halbeath

The FIFEplan strategy context for the Dunfermline area, set by SESplan (see CD 2) is to develop a sub-regional strategy for the North of Dunfermline. This site is proposed for
residential development (1400 units) as part of the North Dunfermline Strategic Development Area.

Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision. For example, a new primary school will be provided on the site.

Site assessments undertaken in preparing the proposed plan were consistent with an assessment framework which considered issues such as the impact on landscape, settlement character, and infrastructure (CD 15). It is, however, acknowledged that a small area of the site shown in the proposed plan is not in the developer’s ownership. This has been recorded as a correction to be made in the adopted version of the Plan.

Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with under the Homes Schedule 4 Issue 2B and its associated supporting paper.

Individual proposals, including DUN043, will be subject to traffic assessments which will identify measures and interventions required to make development proposals acceptable in terms of traffic impact. Development of the site will also deliver part of the Northern Link Road and could lead to the closure of the level crossing at the foot of Kingseat Road.

With regard to the proposed alignment of the Northern Link Road (NLR) shown in the proposed FIFEPlan, the following was considered – provide the NLR within the proposed allocated site, with the works funded directly by the developer; provide the NLR within Council owned land, with the works funded via a transport fund; avoid third part ownership, as far as practically possible, avoid difficult engineering – the use of Council owned former mineral railway lines are ideal as the longitudinal gradient tends to be no greater than 1 in 50, and provide a route that is an attractive alternative route to existing routes; results in no increase or reduced traffic flows on existing routes and provides the primary vehicular access to allocated sites.

The effectiveness of the Northern Link Road (NLR), between the A823 and Whitefield Road, has been tested within the Dunfermline Transport Assessment 2011 (CD 56), undertaken to inform the adopted Dunfermline & West Fife Local Plan (2012) (CD8). There is a preliminary design of the NLR within the Dunfermline Strategic Development Area, but no detailed design will be required until such time the NLR is required. The eastern and western extension of the NLR are being tested as part of the FIFEPlan Strategic Transport Appraisal (STA) (CD 19). The Assessment is being commissioned to look at wider impacts on the trunk road network. The STA has been arranged in discussion with Transport Scotland and with input from Fife Council Transportation and Environmental Services. It is expected that the information from this will inform development obligations and should be available ahead of the Plan Examination in 2015.

Fife Council’s Planning Obligations Framework (March 2015) (CD46) provides guidance on how developers are required to fund community infrastructure when this is needed as
a result of new housing or commercial activity. FIFEplan requires developer investment in new roads and schools. Fife Council is also continuing to fund infrastructure through the approved Capital Plan and by exploring new funding mechanisms. This includes strategic transport interventions such as the Northern Link Road, where each developer along its route will be required, through planning conditions, to provide a section of the road through their site.

The developer requirements as set out in FIFEplan (see Policy 4 Figure 4.1 and North Dunfermline Strategic Development Area Proposal, page71 - CD5) and the Planning Obligations Framework (CD46) identify the requirement for an additional two primary schools in North Dunfermline; with one of these schools at Halbeath. Contributions to a new secondary school and/or provision of land may also be required.

Green Network Priorities are identified, including the establishment of a new high quality greenspace as an integral part of the wider green network within the site and a high quality linear ‘wetland’ park along the route of the Buckie Burn and former railway line.

In addition, a landscape led development framework could capitalise on the site’s landscape assets and panoramic views. Proposals should establish an appropriate landscape setting for the development, and the B912, defining the northern edge of Dunfermline and avoiding perceived coalescence with Kingseat.

Issues of ground stability due to previous mine workings and potential flooding will be investigated further. Ground investigations and an Engineering Report will be required as the site is master planned and will form part of any planning application. A Flood Risk Assessment will also be required by SEPA to assess risk from multiple watercourses.

It should be noted that the Mossmorran to Grangemouth Ethane Pipeline, which is within a Health & Safety Executive (HSE) consultation zone, does not cross the Halbeath site. It runs to the east of the site along the side of the motorway before cutting cross-country to the north of the site. The HSE consultation zone falls within the eastern tip of the development. This means that the HSE would be consulted on any future planning application. If there was deemed to be a safety issue the site would need to be designed accordingly.

The site was considered at the Examination of the adopted Dunfermline & West Fife Local Plan (CD8, page 266, para.104). The Reporter concluded “the strategic environmental assessment indicates that the failure to select the site was not based on environmental grounds. In principle, I believe that this site could be a suitable location for a major expansion of Dunfermline along the lines proposed by the objector (700 houses on the site, with the potential to accommodate 1400 houses in total on an expanded site). The site lies to the north of Dunfermline, and a strategic land allocation here, in itself, would be consistent with the structure plan to the extent that the plan directs that development should be focussed on Dunfermline’s northern side, amongst other locations. The site is not affected by a landscape designation, and it has the landscape capacity to absorb this scale of development. There also appear to be no overriding cultural heritage and ecological constraints which would prevent development. However, the council has chosen alternative sites for their strategic land allocations, and I am not persuaded that they should be added to, or replaced by, this site which does not appear to me to be significantly better.”
Representations expressing concerns about the consultation process will be addressed in the Statement of Conformity (CD45).

DUN044 Land to the north of Wellwood

This site is shown in the adopted Dunfermline & West Fife Local Plan 2012 (CD8) as a potential area of search, as indicated on the strategic framework concept diagram contained within the plan. Following the Examination into the Plan, the Reporter concluded that that the site could form an acceptable extension to the Strategic Land Allocation, but only if a need for further housing land emerged.

The proposed site area is 5.7 ha, with a capacity of 100 units. The capacity proposed by the developer would represent a density of 26/ha. However, SEPA requires the site to have a 6m buffer strip from the watercourse. In addition, no development should be within 10m of the woodland. The route of the Northern Relief Road will run through the site along an east-west axis, providing the primary route within the site. Therefore, whilst the density proposed for the total site is considered acceptable the requirements of the site may mean that the site layout is unlikely to be able to accommodate the density proposed. The total density should remain at 100 units.

DUN045 Rosegreen, Carnock Road

The site is proposed for residential development as part of the North Dunfermline Strategic Development Area (see Issue 3B Spatial Strategy). A Strategic Transport Assessment (STA) is being commissioned to look at wider impacts on the trunk road network. The STA has been arranged in discussion with Transport Scotland and with input from Transportation and Environment Services. It is expected that the information from this will inform development obligations and should be available ahead of the Plan Examination in 2015.

Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision. Detailed matters, such as the specifications of road access, footpaths, cycleways and drainage arrangements for example, will be dealt with at planning application stage. Green Network Priorities are identified for the site.

DUN046 Chamberfield Road

This site is allocated in the Proposed Local Development Plan, it is proposed for residential development as part of the North Dunfermline Strategic Development Area. The FIFEplan strategy for Dunfermline is to develop a sub-regional strategy for North Dunfermline (see Issue 3B Spatial Strategy).

Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with under the Homes Schedule 4 Issue 2B and its associated supporting paper.

Site assessments undertaken in preparing the proposed plan were consistent with an
assessment framework which considered issues such as the impact on landscape, settlement character, and infrastructure (CD 15). It is, however, acknowledged that the site includes garden ground of an existing house (Chamberfield). This has been recorded as a correction to be made in the adopted version of the Plan.

The provision of the Northern Link Road will provide access opportunities to this site and adjoining Kent Street. The Northern Link Road should also help to integrate this area into the Dunfermline settlement. Strategic transport issues are being addressed by the FIFEplan Transport Appraisal (CD19). Individual proposals will be subject to traffic assessments which will identify measures and interventions required to make development proposals acceptable in terms of traffic impact.

Fife Council's Planning Obligations Framework (March 2015) (see CD46) provides guidance on how developers are required to fund community infrastructure when this is needed as a result of new housing or commercial activity. FIFEplan requires developer investment in new roads and schools. Fife Council is also continuing to fund infrastructure through the approved Capital Plan and by exploring new funding mechanisms. This includes strategic transport interventions such as the Northern Link Road, where each developer along its route will be required, through planning conditions, to provide a section of the road through their site.

Potential adverse landscape impacts, particularly on the adjoining Country Park, will need to be addressed as part of any future planning application. The Country Park provides a buffer between Dunfermline and Kingsseat preventing coalescence. Green Network Priorities are identified for the site, including the creation of a high quality landscape and access links into Townhill Country Park.

To reduce the potential risk of coalescence between Townhill and Dunfermline, proposal TWH 002 - Townhill Loch Car Park, allocated as an employment site, could be removed from the plan. The former car park site, which sits out with but immediately adjacent to Townhill, was allocated as a brownfield opportunity site in the Dunfermline & West Fife Local Plan (CD8, page 144), the preferred use being employment. The Proposed Plan (CD5, page 81) continues to identify the site for employment; however Fife’s Employment Land Strategy 2014 (FELS) (CD18) no longer identifies the site as required for employment. Taking all of this into account, Fife Council considers that there is merit in removing the employment designation from TWH 002 and invites the Reporter to make an appropriate recommendation on this issue.

Representation (3870) states that planning permission for the site has been previously refused by a Scottish Reporter. There is no record of any planning appeals. Previous consents only relate to a single storey extension to Chamberfield Farmhouse. However, the site was considered by a Reporter as part of the Examination on the Dunfermline & West Fife Local Plan (see CD 21).

Reporter’s conclusions:

Dunfermline and Halbeath - strategic development areas - general

1. I note that all of the sites allocated for development in north Dunfermline are subject to a requirement that master plans be produced. Text on page 70 requires this for site DUN 035 (part of which is in north Dunfermline). The Strategic Development Area box
on page 71 requires this for the other nine sites. There are references to, among other things, proposed supplementary guidance on design, Designing Places and landscape.

2. In view of the foregoing, it is not clear to me why there should also be an overall development framework for north Dunfermline. Information provided in the proposed plan for each individual site appears to provide a basis for ensuring necessary coordination of layout design. The representation does not demonstrate what purpose would be served by a “shared vision”. My conclusion is that the proposed plan need not be altered.

3. The proposed plan (both on page 70 and on page 71) says that detailed requirements include community services or facilities including health care and shops. The context suggests that developers might be required to construct these facilities.

4. In my experience, health care facilities are normally funded by the Scottish Government and developers are not expected to construct, at their expense, health centres or the like. The scale of development proposed at north Dunfermline is such that there may well be need for one or more health facilities. Sites for such facilities should be identified and reserved for that purpose, with actual provision left to others. The wording of the proposed plan should be adjusted accordingly.

5. The scale of development is also such that new shops are likely to be feasible commercially. Local shops reduce need to travel and can be a great convenience for residents, especially the less mobile. It is therefore appropriate for the proposed plan to facilitate provision of such shops. It is not a purpose of planning to restrict competition between traders. My conclusion is that the proposed plan need not be altered with respect to the reference to shops on pages 70 and 71.

6. Concern about traffic and transportation is a common theme in representations made against the individual sites. Concern about availability of school places is also a common theme in relation to most of the sites. To avoid repetition I deal with these concerns in the following sections.

Dunfermline and Halbeath - strategic development areas - traffic and transportation

7. I note that the proposed plan contains six road proposals in the Dunfermline area. These are DUN 065, Appin Crescent Bypass, DUN 067, Northern Link Road, DUN 068, Western Distributor, DUN 069, Bothwell Gardens Roundabout, DUN 070 Pitreavie Roundabout and ROS 018, King’s Road/Admiralty/A985 junction. Implementation of these proposals was assumed in the strategic transport assessment entitled Fife LDP Modelling Final Report and dated May 2015 (core document 19). Transport Scotland is now satisfied that the strategic transport infrastructure identified in the proposed plan is sufficient to accommodate the level of development proposed. In the proposed plan, Policy 4: Planning Obligations provides a mechanism to assist with implementation of road proposals.

8. In its responses, the council says that individual proposals will be subject to traffic assessments which will identify measures required to make proposals acceptable in terms of traffic impact.

9. I find that the traffic assessments to which the council refers will be an essential part of the process whereby all necessary measures - local measures as well as the six
strategic interventions - are identified. There is also a need to identify in relation to site development the stage at which identified measures must be implemented.

10. My conclusion is that the traffic assessment process can address the concerns about traffic and the need for timely improvements to the road network. In view of the importance of the assessment process, it should be included in the proposed plan as one of the development requirements. This is addressed in this report under Issue 7a(1): Dunfermline & Halbeath – Allocated Sites/Other Proposals (Non SDA) where I make two recommendations regarding transport assessments.

Dunfermline and Halbeath - strategic development areas - availability of school places

11. Regarding availability of school places, the proposed plan (page 70, DUN 035, page 71, Strategic Development Areas, and page 206, Figure 4.1) recognises the need for additional schools. Policy 4: Planning Obligations provides a mechanism for securing additional school places. My conclusion is that the proposed plan adequately addresses the need for more school places.

12. In response to a request for further information (FIR 27), the council makes reference to provision of land for a secondary or joint primary/secondary campus within site DUN 043 (Halbeath). This is the first time that the council has raised this matter and the evidence submitted does not allow me to safely conclude that a requirement for the provision of land for a secondary school on the site is warranted. This is something that the council would have to pursue at a later date. I am not persuaded that the proposed plan should be altered.

13. A legal opinion obtained by Taylor Wimpey expresses the view that the proposed plan could not be lawfully adopted if the Council were to modify it to include a requirement for a secondary school on DUN 043. As I am not proposing to recommend such a modification, there is no need for me to give consideration to the legal opinion.

Dunfermline and Halbeath - strategic development areas - DUN 035, Dunfermline N/W/SW

14. My attention has not been drawn to any part of the proposed plan that refers to “strategic employment land”. So far as I can see, altering the plan so that the 80 hectares of employment land in site DUN 035 is called strategic employment land would make no difference to the status of that land. The representation gives no reason why such an alteration should be made. My conclusion is that the plan need not be altered.

15. The indicative route of the Northern Link Road within site DUN 035 includes a connection to East Baldrigde Drive. No connection to Lady Nairne Road is shown. The council says that there is no proposal to extend Lady Nairne Road to provide vehicular access to DUN 035. This being so, there is no need to amend the proposed plan in response to concern about Lady Nairne Road.

16. Regarding the objection to DUN 035 as a whole, I note that the site is identified in the current local plan as a strategic land allocation. As explained in the part of this report dealing with Issue 3b: West Fife Area Strategies, there is now a requirement not only for the strategic land allocation in the current plan but also for additional development land at north Dunfermline. My conclusion is that site DUN 035 should be retained in the proposed plan.
17. Text on pages 70 and 71 of the proposed plan refers to master plans and to community services or facilities including health care. I find that this makes adequate provision for consideration of impact on healthcare and timescale. My conclusion is that the proposed plan need not be altered.

Dunfermline and Halbeath - strategic development areas - DUN 038, Kent Street

18. The north-east part of site DUN 038 is traversed by an overhead electricity line and contains a pylon. It appears that this part of the site is not suitable for built development. The sketch layout that accompanies representation 1191 shows no built development in the north-east part of the site. This appears to be the chief reason why the sketch layout shows a smaller number of dwellings than the number estimated in the proposed plan - 89 dwellings compared to 120.

19. The sketch layout also shows nine houses fronting onto and with direct access to Townhill Road. At first glance, I am not convinced that this would be a satisfactory arrangement. Townhill Road is a bus route and appears to function as an important local distributor road. Direct frontage access to such a road is best avoided so that free flow of traffic and residential amenity are not impaired.

20. From the foregoing, I find that the concern about overdevelopment is justified and that, if the site is to be retained in the proposed plan, the estimated capacity should not be as much as 120.

21. The sketch layout shows woodland planting within the north-east part of the site on either side of a corridor beneath the electricity lines. This planting would create no more than a very brief break between the built-up areas of Dunfermline and Townhill, bearing in mind that ground just to the north of the site is identified for employment and possibly housing development. This ground is site TWH 002, Townhill Loch Car Park. My conclusion is that concern about coalescence between Dunfermline and Townhill is justified.

22. Representations regarding site TWH 002 are considered under Issue 7b: Townhill. My recommendation in the Issue 7b section of this report is that site TWH 002 be omitted from the proposed plan.

23. By not having houses that front directly onto Townhill Road, the possibility arises of having some form of landscaped strip along the frontage.

24. The prospect of landscaping in the north-east part of site DUN 038, the deletion of site TWH 002 and the possibility of frontage landscaping lead me to conclude that maintenance of satisfactory separation between Dunfermline and Townhill could be achieved. My conclusion is therefore that deletion of site DUN 038 is not justified on grounds of coalescence.

25. In the proposed plan, two of the green network priorities for site DUN 038 are “high quality landscape and access links into Townhill Country Park”. I find that this addresses concerns about effects on the country park and accesses to it. This also suggests to me that, as indicated on the sketch layout, landscaping should be provided not only on the north-east part of the site but also on other parts of the site. This is a further factor in considering the housing capacity of the site.
26. Drawing together the various factors that have a bearing on site capacity, my conclusion is that an appropriate number for the estimated capacity is 80. This would address the concern regarding overdevelopment, and the plan should be altered accordingly.

27. There is concern that the two fields to the south and south-west of Town Loch would be isolated and fall into disuse. Details of the farm unit with which these fields are associated and means of access to them have not been provided. From my inspection, I note a field access at the west end of Chamberfield Road and other access possibilities from the access serving the country park and water-ski centre. I find that it has not been demonstrated that continued agricultural use of the two fields would be impracticable. The proposed plan need not be altered in relation to this concern.

28. I note the variety of wildlife that can be seen when walking in the site. It has not been demonstrated that the site has any special wildlife value or greater wildlife value than other land in north Dunfermline to which development would have to be redirected if the established requirement for housing land is to be met.

29. I see no reason why development on the site should have an unacceptably detrimental effect on neighbours. Houses that adjoin open ground are almost always going to suffer some reduction in amenity if that ground is built on. In the present case, the planning application process, supported by policies in the proposed plan, will be able to ensure that amenity is not reduced by an unacceptable extent.

Dunfermline and Halbeath - strategic development areas - DUN 039, Colton

30. The proposed plan says that housing will be built only on the south-western part of the site. Proposals for the whole site are to enhance the wider landscape setting of the country park. The site area is given as 33 hectares. The estimated capacity is 300 dwellings.

31. I note that the estimated capacity is much less than might be expected for a site of this size. This no doubt reflects the intention that housing be confined to the south-western part of the site. It also gives plenty of scope to fulfil the requirement to enhance the setting of the country park. In view of this, I find that impact on the country park is capable of being minimised and is not a reason to alter the proposed plan.

32. The required landscaping and the restriction of housing to the south-western part of the site suggest to me that it would be possible to create a distinct break in built development between Townhill and Wellwood. This would adequately address concerns about coalescence and impact on Townhill.

33. Regarding traffic noise, I take it the concern is with traffic on the local section of the Northern Link Road. If the Northern Link Road facilitates reasonably free-flowing traffic and speed is limited to that appropriate to an urban street, I find that noise is not likely to exceed acceptable levels. If effects on particularly noise-sensitive receptors such as dwellings or the country park are identified, provision of acoustic barriers such as fencing or mounding may be necessary. This can be given consideration at the detailed design stage when applications for planning permission will have to be made.

34. Regarding wildlife, it has not been demonstrated that the site has any special wildlife value nor that there would be any particularly adverse impact on wildlife in the
country park.

35. Loss of agricultural land is unavoidable if the strategic requirement for development at north Dunfermline is to be met. It has not been shown that meeting this need on some other land would be preferable from an agricultural point of view. Nor has it been shown that continued agricultural use, or some other beneficial use, of the two fields to the south of site DUN 039 would not be possible if DUN 039 were to be developed.

36. The planning application process would ensure that foul drainage needs were met.

37. Text on pages 70 and 71 of the proposed plan refers to master plans and to community services or facilities including health care. I find that this makes adequate provision for health facilities.

38. Residential development on site DUN 039 would contribute to the strategic requirement for new dwellings. Concern about “commuters from south of the Forth” is addressed under Issue 3b: West Fife Area Strategies.

39. Regarding the objection to new housing on sites DUN 040, DUN 041 and DUN 042, there is a strategic requirement for additional development land at north Dunfermline. This is explained in the part of this report dealing with Issue 3b: West Fife Area Strategies. Sites DUN 040, DUN 041 and DUN 042 would contribute to meeting this requirement. My conclusion is that the sites should be retained in the proposed plan, provided other concerns about development on this edge of the town can be addressed.

40. It is contended that there are old mine workings beneath the sites and that within the sites there were two quarries and a refuse coup. The council does not dispute this and says that site investigations and an engineering constraints report will be required at the master plan and planning application stages.

41. I find it likely that the previous mining, quarrying and refuse disposal activities are of significance. They may give rise to a need for remedial work. They may affect layout design. In view of this significance, the need for site investigation should be included as a development requirement in the proposed plan. This would address the concerns about the effect of previous activity on the proposed new development.

42. The effect of proposed development on the foundations of Swallowdrum Cottage and its septic tank is a private matter to be resolved directly between the parties involved. Houses that adjoin open ground are almost always going to suffer some reduction in amenity if that ground is built on. In the present case, the planning application process, supported by policies in the proposed plan, will be able to ensure that the amenity of Swallowdrum Cottage is not reduced by an unacceptable extent.

43. Some disturbance during construction is difficult to avoid. With a view to minimising disturbance to neighbours, there is scope in the planning application process to consider matters such as site access for construction traffic, phasing and hours of work.

44. With regard to flooding, I note that the proposed plan requires flood risk assessments in relation to sites DUN 040 and DUN 041. This should identify any
measures needed to ensure that flood risk is acceptably low.

45. During my site inspection, I was not aware of the smell to which reference is made. If premises are emitting a smell and it is contended that this amounts to a nuisance, it may be that powers in the Environmental Protection Act 1990 could be invoked. This is not a matter for the local development plan.

46. Master plans are to be produced for, among others, sites DUN 040, DUN 041 and DUN 042. This is set out on page 71 of the proposed plan. At the master-planning stage, one of the topics to be addressed is access. As explained above, transport assessments will also be needed. The access purpose that is to be served by the gap between 44c and 44d Carnock Road may be determined as part of the master-planning and transport assessment processes. In view of this, I find no need to alter the proposed plan to say at this stage how the gap should be used.

47. The master-planning and transport assessment processes should also reveal any potential traffic congestion problem on Craigluscar Road and, if necessary, identify a solution.

Dunfermline and Halbeath - strategic development areas - DUN 043, Halbeath

48. There is a strategic requirement for additional development land at north Dunfermline. This is explained in the part of this report dealing with Issue 3b: West Fife Area Strategies. Site DUN 043 would contribute to meeting this requirement. Regarding objection to any new housing on site DUN 043 and to the amount of housing proposed, my conclusion is that the Halbeath site should be retained in the proposed plan, provided other concerns about development on the site can be addressed.

49. Traffic through Kingseat, on minor roads and on feeder roads to the town centre are matters that would be considered in the traffic assessment process to which I refer in the traffic and transportation section, above.

50. In meeting the strategic requirement for development land loss of open space is unavoidable. The proposed plan’s green network priorities for site DUN 043 include landscaping and green space and should ensure provision of adequate open space within the new development.

51. Loss of agricultural land is inevitable if the strategic requirement for development at north Dunfermline is to be met. It has not been shown that meeting this need on land other than site DUN 043 would reduce the amount of prime land affected or would be preferable from an agricultural point of view.

52. Regarding the strategic environmental assessment, submissions do not demonstrate that protected species are, or are likely to be, present within the site. I do not find that this concern justifies alteration to the proposed plan.

53. In response to concern about mine workings beneath the site, the council says that ground investigations and an engineering report will be required at the master-planning stage. In my experience, mine workings can have a significant effect on site development. For this reason, the need for investigation should be included as a development requirement in the proposed plan. This would address the concern that has been raised.
54. I note that the eastern tip of site DUN 043 is within the Health and Safety Executive consultation zone for the ethane pipeline. This means that the Health and Safety Executive will have to be consulted. I find that the need to consult the Health and Safety Executive adequately meets concern about the pipeline. To help ensure this important procedure is not overlooked, it should be mentioned in the text associated with DUN 043.

55. In the proposed plan, one of the development requirements for site DUN 043 is that a flood risk assessment be carried out. Such an assessment would consider not only possible flooding within the site, but also any effects that development might have on flooding outwith the site. I find that this satisfactorily answers the concern about flooding, including possible effect on the Queen Margaret estate.

56. Text on pages 70 and 71 of the proposed plan refers to master plans and to community services or facilities including health care. I find that this makes adequate provision for medical services.

57. There is concern that site DUN 043 includes land which is in the common ownership of neighbouring proprietors. The council intends to make a “correction” to the proposed plan. I have not been provided with details of the location and boundary of this land. If, as appears to be the case, the land in question is relatively small in extent I find it unlikely that it will have any significance for development of site DUN 043 as a whole. Minor adjustments to the plan may be carried out by the council without my formal recommendation.

58. Concern about impact on the value of existing houses is not a planning matter. Houses that adjoin open ground are almost always going to suffer some reduction in amenity and perhaps some consequential loss of value if that ground is built on. In the present case, the master-planning and planning application processes, supported by policies in the proposed plan, should ensure that amenity is maintained at an acceptable level.

59. Adequacy of the public consultation process is considered under Issue 1: General Comments and in the Statement of Conformity with the Participation Statement.

60. My conclusion is that site DUN 043 should be included in the proposed plan.

61. Representation 3694 (Taylor Wimpey) requests that site DUN 043 be extended to take in an additional 2.3 hectares. The location of this additional land is shown in the Development Framework Report that accompanies the representation.

62. The council’s response to the requested extension is given in its reply to further information request 27. The council (at officer level) raises no objection.

63. I note that the suggested extension of site DUN 043 is shown as part of "Option 2c" in the Main Issues Report. It is part of an enclave that would be within the built-up area if site DUN 043 as shown in the proposed plan were to be developed. Site DUN 043 would still be separated from existing development at Queen Margaret Gardens, though by a reduced amount. In response to one of the requests for further information (FIR 55), the developer expresses the opinion that the additional 2.3 hectares would only help deliver the capacity of 1,400 homes that is identified in the proposed plan. The developer is not seeking an increased number of dwellings on the enlarged site.
64. I find that the extension would have the advantage of helping to ensure that any
development on the 2.3 hectares was integrated into development on the remainder of
DUN 043. The land in question is within the proposed settlement boundary. My
conclusions about the smaller DUN 043 site set out above would not be altered if the site
were extended as proposed. I therefore accept that the boundary of DUN 043 should be
extended to take in the additional 2.3 hectares.

65. As already noted in an earlier section headed "Dunfermline and Halbeath - strategic
development areas - availability of school places", the council, in response to a request
for further information (FIR 27), refers to provision of land for a secondary or joint
primary/secondary campus within site DUN 043. For the reasons given in the earlier
section, I do not recommend that the proposed plan be altered to refer to this.

Dunfermline and Halbeath - strategic development areas - DUN 044, Land to the north
of Wellwood

66. Site DUN 044 has an area of 5.7 hectares. A site of this size with no development
constraints could well accommodate 150 dwellings. This is the figure put forward in the
representation.

67. The proposals map shows the notional route for the Northern Link Road traversing
the full length of the site. Development requirements listed on page 74 of the proposed
plan include a watercourse buffer strip, a ten-metre woodland stand-off, a high-quality
landscape edge to the east and a high-quality development edge to the A823.

68. All of the features mentioned in the preceding paragraph reduce the likely
residential capacity of the site. In view of the need for them, I find that the proposed
plan’s estimated capacity of 100 dwellings is realistic and that the suggested 150 figure
would be much too high.

69. My conclusion is that the plan should not be altered.

Dunfermline and Halbeath - strategic development areas - DUN 045, Rosegreen,
Carnock Road

70. The area of site DUN 045 is given as 2.8 hectares and the estimated capacity
is 100 dwellings. Compared to other sites in the proposed plan, this appears to be a
relatively high density. Text in the proposed plan refers to a watercourse buffer strip, a
ten-metre stand-off from woodland, a north-south high-quality pedestrian and cyclist
route and other landscape and green space requirements. I find that all of these
requirements indicate that the overall density of dwellings within the site should be lower,
rather than higher, than normal. I find the concern that dwellings are being squeezed
into the site is justified.

71. More fundamental are the concerns about the logic of the proposed settlement
boundary, intrusion into the countryside and implications for future use of adjoining land.

72. From my inspection, I note that the site is within a landscape unit that is defined by
Carnock Road (A907) to the north, Lundin Road to the west, the old railway line, now
cycle route 794, to the south and woodland adjoining the under-construction Allanwater
Homes housing development to the east. The land slopes down from Carnock Road,
quite steeply at first then more gently. Site DUN 045 occupies a strip within this
landscape unit. Much of the site’s west and east boundaries lack strong defining features.

73. I find that the proposed housing development would sit uncomfortably within the landscape unit described above. The west and east boundaries would have an arbitrary appearance. Development would appear as an intrusion, very poorly related to the existing built-up area. The major new development envisaged for sites DUN 040, DUN 041 and DUN 042, all to the north of Carnock Road, would not alter this unsatisfactory appearance.

74. If development is to be encouraged on site DUN 045, it is not clear to me why development is not also being encouraged on adjoining land to the west and east. If there is no good reason to differentiate between site DUN 045 and adjoining land, the pressure for further expansion mentioned in the representation may be difficult to resist, resulting in piecemeal, uncoordinated developments.

75. I note that the assessment for this site (reference LDP-DUN019) contains some reservations. The transport assessment summary includes the opinion that the site is “fairly isolated from existing housing areas” and therefore it “cannot be integrated into the existing settlement.” The initial settlement summary includes: “Any housing on the site would have poor integration with surrounding communities.”

76. I accept that land for residential development needs to be identified to meet the SESplan North Dunfermline SDA requirements. Notwithstanding the strength of this need, it is outweighed by the drawbacks that I have described regarding site DUN 045. My conclusion is that the site should be deleted from the proposed plan.

Dunfermline and Halbeath - strategic development areas - DUN 046, Chamberfield Road

77. Site DUN 046 adjoins the west side of site DUN 038. I have already found that site DUN 038 should be retained in the proposed plan, but with a reduced estimated housing capacity. DUN 046 is in effect an infill site between DUN 038 to the east and the Fairways estate to the west. I find that development on DUN 046 would not add significantly to the coalescence that is a concern in representations.

78. I note that developer requirements in the proposed plan (page 75) include a buffer strip and a woodland stand-off. Green network priorities include high-quality landscape and access links into the country park. The sketch layout submitted with representation 1204 appears to meet these requirements to some extent but not entirely.

79. I find that development that meets the requirements in the proposed plan is likely to contain less that the 47 dwellings shown on the sketch layout. My conclusion is that the concern that density is too high is justified. The estimated capacity of 50 in the proposed plan is too high and should be reduced to 40.

80. Wider issues relating to access and traffic are considered in the traffic and transportation section, above. Regarding concern about use of Chamberfield Road, during my inspection I noted that there was some on-street parking, most significantly near to the junction with Townhill Road. This junction is at a bend and close to the Kingsseat Road - Townhill road junction. The configuration of roads at this location is thus of some complexity.
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<tr>
<td>81.</td>
<td>It seems to me that increased turning movements into and from Chamberfield Road should be avoided if possible. The suggestion that access to site DUN 046 be taken through site DUN 038 therefore has merit. It would also mean that the amenity of existing houses on Chamberfield Road, some of which are quite close to the carriageway, would not be affected by the passage of additional traffic.</td>
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<tr>
<td>82.</td>
<td>If the transport assessments for these sites confirm my concerns about increased use of Chamberfield Road, access to DUN 046 should be taken through DUN 038. The proposed plan should refer to this.</td>
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<td>83.</td>
<td>In the proposed plan, two of the green network priorities for site DUN 046 are “high quality landscape and access links into Townhill Country Park”. I find that this addresses concern about impact on the country park.</td>
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<td>84.</td>
<td>There is concern that the woodland stand-off of 10 metres is insufficient. In my view, the distance for the stand-off would best be determined by detailed site survey work at the planning application stage. The wording in the proposed plan should be adjusted accordingly.</td>
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<td>85.</td>
<td>Loss of agricultural land is unavoidable if the strategic requirement for development at north Dunfermline is to be met. It has not been shown that meeting this need on some other land would be preferable from an agricultural point of view. Nor has it been shown that continued agricultural use, or some other beneficial use, of the two fields to the south and south-west of Town Loch would not be possible if DUN 046 were to be developed.</td>
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<td>86.</td>
<td>The proposed plan requires that there be a flood risk assessment for site DUN 046. This assessment would identify need for measures necessary to avoid any unacceptable increase in flood risk downstream or to the north-west.</td>
</tr>
<tr>
<td>87.</td>
<td>The planning application process would ensure proper provision for foul drainage from development on the site.</td>
</tr>
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<td>88.</td>
<td>Ground conditions, including water table level and past mining, would be investigated at the planning application stage. Submissions do not demonstrate that ground conditions are likely to prevent development.</td>
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<tr>
<td>89.</td>
<td>Regarding pipelines, submissions do not provide evidence that there are pipelines beneath or close to the site.</td>
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<tr>
<td>90.</td>
<td>I see no reason why development on the site should have an unacceptably detrimental effect on neighbours’ amenity. Houses that adjoin open ground are almost always going to suffer some reduction in amenity if that ground is built on. In the present case, the planning application process, supported by policies in the proposed plan, will be able to ensure that amenity is not reduced by an unacceptable extent.</td>
</tr>
<tr>
<td>91.</td>
<td>Concern about “commuters from south of the Forth” is addressed under Issue 3b: West Fife Area Strategies.</td>
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Reporters' recommendations:

I recommend that the following modifications be made:

1. On page 70 of the proposed plan, delete the bullet point that says “Community services including health care and local shops” and put instead the following two new bullet points:

   “Identification of sites suitable for provision of health care.
   Community services including local shops”.

2. On page 71 of the proposed plan, delete the bullet point that says “Community facilities including health care and local shops” and put instead the following two new bullet points:

   “Identification of sites suitable for provision of health care.
   Community facilities including local shops”.

3. On page 72 of the proposed plan, for the estimated housing capacity of site DUN 038, Kent Street, delete “120” and put instead “80”.

4. On page 72 of the proposed plan, under development requirements for site DUN 038, Kent Street, include the following:

   “Development design must be co-ordinated with development design for site DUN 046 with a view to access to DUN 046 being taken through DUN 038.”

5. On pages 72 and 73 of the proposed plan, under “development requirements” for site DUN 040, Craigluscar Road/Carnock Road, site DUN 041, North Dunfermline (Swallow Drum) and site DUN 042, Carnock Road insert the following:

   “Site investigation required to investigate mining, quarrying and refuse disposal that are believed to have taken place in the locality. Necessary remediation and mitigation measures to be identified.”

6. On page 74 of the proposed plan, alter the area of site DUN 043, Halbeath by deleting “77.2” and putting instead “79.5”.

7. On the Dunfermline, Townhill, Crossford & Halbeath inset of the proposals map, include within the boundary of site DUN 043, Halbeath the 2.3 hectares of land that is identified in the Development Framework Report that accompanies representation 3694 (Taylor Wimpey).

8. On page 74 of the proposed plan, under “development requirements” for site DUN 043, Halbeath insert the following:

   “Site investigation required to investigate mining that is believed to have taken place beneath the site. Necessary remediation and mitigation measures to be identified.”
“Eastern tip of site is within the Health and Safety Executive consultation zone for the ethane pipeline. Health and Safety Executive must be consulted.”

9. On page 75 of the proposed plan, delete the entry for DUN 045, Rosegreen, Carnock Road.

10. On the Dunfermline, Townhill, Crossford & Halbeath inset of the proposals map, delete site DUN 045 and redraw the settlement envelope boundary to exclude the site from the settlement envelope.

11. On page 75 of the proposed plan, the estimated housing capacity figure for site DUN 046, Chamberfield Road, (“50”) should be deleted and “40” should be put instead.

12. On page 75 of the proposed plan, under site DUN 046, Chamberfield Road delete “No development should be within 10m of woodland and boundary/TPO trees." and put instead the following:

   “A protective strip is required between development and adjoining trees and woodland to ensure no detriment to the trees and woodland. Detailed survey required to determine the width of the strip.”

13. On page 75 of the proposed plan, under development requirements for site DUN 046, Chamberfield Road, include the following:

   “Development design must be co-ordinated with development design for site DUN 038. If transportation assessments identify a need for access to DUN 046 to be taken through DUN 038, the layout of both sites should be designed accordingly.”
**Issue 7a(3) Dunfermline & Halbeath – Non Allocated Sites**

|----------------------------|--------------------------------------------------------|-------------------------|

**Body or person(s) submitting a representation raising the issue (including reference number):**

- Keith Bedborough (737, 1977, 2232)
- Avant Homes (966)
- CALA Management Ltd (1696)
- Susan Hunter (1730)
- Alfred Stewart Property Foundation Ltd (1780)
- Ian S Harley (2034, 2051)
- Power Developments Ltd (2061)
- Gateside Design (3653)
- Milesmark & Baldridge Community Council (3730)
- Stuart Gillies (3884)
- Marion Gillies (3885)
- Graham Neil (3894)
- Mary McLaren (3901)

**Provision of the development plan to which the issue relates:**

- Settlement Plan: Dunfermline & Halbeath

**Planning authority's summary of the representation(s):**

**Candidate site LDP-DUN005 East Baldridge Drive**

Avant Homes (966): Object to the non-allocation of candidate site LDP-DUN005. This site has been used as a general amenity area, it provides very little visual amenity and has little habitat value and is underused as an open space possibly due to the quality and range of other amenity spaces within a reasonable walking distance. Allocating 30 units on part of the site would provide capital to invest in upgrading the remainder of the site as open space with improved play facilities and landscaping.

Allocating this site would take advantage of existing infrastructure and services (a sustainable development approach); would provide variety and choice of housing options and help to address the shortfall in effective housing land supply within this Housing Market Area. It would also enhance the quality and amenity of the remaining greenspace, providing significant local community benefits.

Milesmark and Baldridge Community Council (3730): Support the non-inclusion of candidate sites LDP-DUN005, LDP-DUN017 (land at Berrylaw) and LDP-DUN018 (land at West Baldridge Farm). Milesmark and Baldridge Community Council agree that these sites should be designated as protected open space or greenbelt as now shown within the Proposed Local Development Plan.

Mary McLaren (3901), Graham Neil (3894), Stuart Gillies (3884), Marion Gillies (3885): Support the plan designating Candidate sites LDP-DUN005 and LDP-DUN018 West Baldridge Farm as protected open spaces.

Support the non-allocation of candidate site LDP-DUN017 land at Berrylaw.
**Candidate site LDP-DUN004 Middlebank Smallholdings**

Cala Management Ltd (1696): Object to non-inclusion of Middlebank Smallholdings, candidate site (LDP-DUN004). It has been demonstrated that the Middlebank site offers a deliverable and environmentally acceptable development option which is well connected to its surroundings (including the M90, Inverkeithing/Rosyth Stations, bus services, footpath/cycle routes, etc) and offering a wide choice of facilities. The development would support delivery requirements but beyond this would also provide a bespoke housing development on an attractive site, creating a high quality residential environment. Infrastructure issues related to the development can be addressed and should not be considered a constraint to delivery (see submitted documents 1.Site Plan, 2.Extract from the Dunfermline East Investment Zone document, 3.Primary Education Issues Assessment, 4.Vision Document, 5.Transport Assessment, and 6.Site Effectiveness Assessment).

Keith Bedborough (737, 1977, 2232): Support non-inclusion of site at Middlebank Smallholdings - assessed as candidate site LDP-DUN004 not supported in the Main Issues Report (CD12) and Development Strategy Consultations (July 2014) (CD13). It is unnecessary to re-open this debate when sufficient strategic housing allocations have already been identified elsewhere. Fife Council to their credit have excluded this site for development hence it’s removal from the development plan, and one would expect that the Scottish office will be consistent with their ruling of October 2012 on the matter.

Susan Hunter (1730): Support non-inclusion of Middlebank Smallholdings from the proposed plan for the reasons given in the document, in particular those of infrastructure unsuitability and rural identity maintenance.

**Candidate site LDP-DUN002 Longriggs**

Alfred Stewart Property Foundation Ltd (1780): Object to the non-allocation of Candidate site LDP-DUN002 Longriggs, Dunfermline for residential development (50 units) and associated uses. Development on the site would use existing infrastructure and could provide a range and choice of house types and tenures including affordable housing. The site is sustainable, effective and deliverable in the short to medium term and would not conflict with the wider FIFEplan aims for Dunfermline.

**Candidate sites LDP-DUN011 Masterton Farm and LDP-DUN013b Masteron Site 2**

Ian S Harley (2034, 2051): Object to the non-allocation of candidate sites LDP-DUN011 and LDP-DUN013b, as it is considered that the sites would comply with the FIFEplan strategy.

Issues relating to the provision of a generous supply of housing in accordance with the requirements of the SPP, the removal of windfall site assumptions from the housing land supply figures, and compensatory provision relating to sites removed from the supply at the 9th September 2014 meeting of the Fife Council Executive Committee, provide ample scope for additional allocations to be made at Masterton.

Continuing failure in delivery, especially of the Strategic Development Areas, is likely to result in a significant shortfall over the plan period. FIFEplan is considered to be overly optimistic. FIFEplan should allocate additional sites capable of contributing to the effective supply in the plan period to 2026 to address this.
Candidate sites LDP-DUN011 and LDP-DUN013b could contribute to the effective supply. These sites are free from any constraints in terms of the test for effectiveness set out under PAN 2/2010 (CD10) and are capable of contributing towards the meeting the SESplan housing land requirement in the short to medium term with a local scale development that does not undermine implementation of the Strategic Development Areas. Consider that there are no significant issues in terms of landscape impact and that development offers opportunities to address adverse impacts associated with existing development to the north and improve the overall landscape setting of Dunfermline. Skylark Road provides a strong and defensible boundary for containment of the site. The primary school capacity needs to be addressed irrespective of further allocations within the plan. There is active housing developer interest in site LDP-DUN013b.

Dunlin Drive

Power Developments Ltd (2061): Objects to non-allocation of land at Dunlin Drive as a development opportunity. The site is currently unkempt grassland within the Dunfermline Eastern Expansion area. Planning permissions have previously been granted for the site for a mix of commercial, care home and community uses. This demonstrates that the site has been considered suitable for development in the past and should be recognised in FIFEplan. The site has been extensively marketed for retail/commercial/care home interest without success, therefore residential use is now being considered for the site.

FIFEplan is not consistent with SESplan and its Supplementary Guidance nor with Scottish Planning Policy in respect to meeting housing land requirements and the need to maintain a 5-year housing land supply at all times. There is a significant shortfall in the number of houses that are likely to be delivered as an outcome of FIFEplan. A large number of additional effective housing sites need to be allocated.

FIFEplan should identify the site at Dunlin Drive as a ‘Development Opportunity’ suitable for a variety of uses including Retail (Class 1), Financial, Professional and Other Services (Class 2), Food & Drink (Class 3), Residential Institution (Class 8), Housing (Class 9), Non-Residential Institution (Class 10) and Sui Generis (Hot-Food Takeaway).

60a Carnock Road

James Watters (3653): Object to the non-inclusion of our clients land at 60a Carnock Road as a possible development site. Two major sites have been allocated DUN 041North Dunfermline (Swallow Drum) and DUN 045 Rosegreen, Carnock Road which bound our clients land. We feel that the site is suitable for inclusion within an extended settlement envelope regardless of whether sites 041 and 045 are finally adopted and would request its inclusion in the plan.

Modifications sought by those submitting representations:

Candidate site LDP-DUN005 East Balridge Drive

Avant Homes (966): Allocate candidate site LDP DUN005 as a housing opportunity site with capacity 30 units, including affordable housing, and the provision of improvements to the retained areas of open space.
Candidate site LDP-DUN004 Middlebank Smallholdings

Cala Management Ltd (1696): Allocate candidate site LDP-DUN004 as a housing opportunity.

Candidate site LDP-DUN002 Longriggs

Alfred Stewart Property Foundation Ltd (1780): Allocate candidate site LDP-DUN002 for residential development (50 units) and associated uses.

Candidate sites LDP-DUN011 Masterton Farm and LDP-DUN013b Masteron Site 2

Ian S Harley (2034, 2051): Allocate candidate sites LDP-DUN011 and LDP-DUN013b for residential development.

Dunlin Drive

Power Developments Ltd (2061): Allocate land at Dunlin Drive as a ‘Development Opportunity’ suitable for a variety of uses including Retail (Class 1), Financial, Professional and Other Services (Class 2), Food & Drink (Class 3), Residential Institution (Class 8), Housing (Class 9), Non-Residential Institution (Class 10) and Sui Generis (Hot-Food Takeaway).

60A Carnock Road

James Watters (3653): Allocate 60A Carnock Road as a housing site.

Summary of responses (including reasons) by planning authority:

Note: Where a number of representations were received to sites a conjoined response has been prepared covering the various issues raised within the individual representations.

Candidate site LDP-DUN005 East Baldridge Drive

This site is allocated as "Protected Open Space" in the Proposed Local Development Plan. It is currently allocated as "Protected Open Space" in the Dunfermline & West Fife Local Plan 2012 (CD8). The site is a well-used community facility and contributes to the enhancement of the local environment. The site has, therefore, not been included in the Local Development Plan.

Note, Milesmark and Baldridge Community Council (3730 ) agree that this site should be designated as protected open space or greenbelt as shown within the Proposed Local Development Plan.

Candidate site LDP-DUN004 Middlebank Smallholdings

The FIFEplan strategy context for the Dunfermline area, set by SESplan, is to develop a sub-regional strategy for the North Dunfermline Area. This site does not lie within the Dunfermline North Strategic Development Area. Detailed consideration of site issues also highlights that its development would have environmental impacts on the important
landscape setting for Dunfermline and gateway to Fife together with access and education infrastructure capacity issues.

It is considered that the housing land requirement will be met by the sites allocated in the Proposed Local Development Plan. See Issue 2B and associated supporting paper which explains the methodology and assumptions used to identify the housing shortfall; compliance with SDPs and SPP; effectiveness of sites; phasing of new sites; ability to meet the requirement; and impact of adding more housing sites in addressing the requirement.

Local Plan Examination Dunfermline and West Fife Local Plan Report (CD 21) concluded that that ‘given the potential capacity of the sites, there are likely to be significant community infrastructure requirements to address, which could affect the timing of any development’. He also concluded that ‘on physical factors, road access is a constraint, and it is not properly explained’. The Reporter further concluded that the allocation was inconsistent with elements of the Structure Plan.

However, concern has been expressed by the City of Dunfermline Area Committee that the site had been left isolated. It is surrounded by developments and could not be used as agricultural land at the moment. It remains zoned for agriculture, but there are practical problems in accessing the site with farm vehicles. Fife Council now considers this matter should be explored further and invites the Reporter to make an appropriate recommendation on this issue.

Note, Keith Bedborough (737, 1977, 2232) and Susan Hunter (1730): support the non-inclusion of the site at Middlebank Small Holdings.

Candidate site LDP-DUN002 Longriggs

The site has not been allocated as its development would not comply with the strategy of the Proposed Local Development Plan, which focuses development on Dunfermline North. In addition, the development would have significant environmental impacts on the important landscape setting for Dunfermline and gateway to Fife together with access and education infrastructure capacity issues.

It is considered that the housing land requirement will be met by the sites allocated in the Proposed Local Development Plan. The phasing of sites, as identified in the Action Programme, will provide for a five year housing supply throughout the lifetime of FIFEplan. The level of housing land required has been tested by independent Reporters through the SESplan Strategic Development Plan Examination, and approved by Scottish Ministers. Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with under the Homes Schedule 4 (2B) and it’s supporting housing paper.

Candidate sites LDP-DUN011 Masterton Farm and LDP-DUN013b Masteron Site 2

Site 1 has not been allocated as its development would not comply with the strategy of the Proposed Local Development Plan, which focuses development on Dunfermline North. In addition, the development would have significant environmental impacts on the important landscape setting for Dunfermline and gateway to Fife. Site 2 Masterton Road has been retained as a proposal (CD5, proposal DUN030 Land at Masterton (west of Masterton Road) for a residential site, as in the adopted Dunfermline & West Fife Local
Plan 2012 (CD8) following the Reporter’s conclusion at the Examination. The Reporter further concluded that the site to the east, between Masterton Road and Skylark Road (site 1) was an inappropriate extension of the settlement.

It is considered that the housing land requirement will be met by the sites allocated in the Proposed Local Development Plan. The phasing of sites, as identified in the Action Programme, will provide for a five year housing supply throughout the lifetime of FIFEplan. The level of housing land required has been tested by independent Reporters through the SESplan Strategic Development Plan Examination, and approved by Scottish Ministers. Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with under the Homes Schedule 4 (2B) and it’s supporting housing paper.

**Dunlin Drive**

The Proposed Local Development Plan allocates land for housing across the Dunfermline & West Fife Housing Market Area, sufficient to meet statutory requirements.

Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with under the Homes Schedule 4 (2B) and its associated supporting paper. All sites identified for housing development in the Proposed Local Development Plan have been the subject of site assessments (CD15) and public consultation.

The site is outwith the Strategic Development Areas identified in SESplan (CD2). The adopted Local Plan already identifies a number of housing sites of varying sizes in the area. It is considered that these allocations meet the local requirement at the present time and provide a good range of locations and site sizes within the area.

However, it is recognised that the site sits within the settlement boundary in the adopted local plan and, therefore, there is a presumption in favour of development.

The site would be subject to further detailed assessment against relevant policies on submission of a planning application.

**60A Carnock Road**

The Proposed Local Development Plan allocates land for housing across the Dunfermline & West Fife Housing Market Area, sufficient to meet statutory requirements.

Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with under the Homes Schedule 4 (2B) and it’s supporting housing paper. All sites identified for housing development in the Proposed Local Development Plan have been the subject of site assessments (CD15) and public consultation.

However, the site could be bound by DUN041 North Dunfermline and DUN045 Rosegreen, Carnock Road in the adopted local plan and will sit within the settlement boundary, where there will be a presumption in favour of development.

The site would be subject to further detailed assessment against relevant policies on submission of a planning application.
**Reporters conclusions:**

**Dunfermline and Halbeath, non-allocated site - East Baldridge Drive (LDP-DUN005)**

1. The site at East Baldridge Drive is 4.6 hectares in extent. It is in use as public open space. In the adopted local plan and in the proposed local development plan it is designated as protected open space. The representation proposes residential development of approximately 30 dwellings on 1.4 hectares of the site and improvements to the open space within the remainder of the site.

2. In response to a request for further information (FIR 35), the representor has submitted an Access Statement. This includes a preliminary assessment of the access opportunities for the site. It is envisaged that the main vehicular access point would be taken as a spur from Myrtle Wynd. It is said that an additional potential vehicular access could be provided at a choice of locations, with design discouraging through traffic.

3. A late representation raises issues of access and land ownership. A request for further information (FIR 106) sought responses from the representor and the council.

4. From my inspection, I note that large parts of the site have been planted with trees. Most of the rest of the site is grassed. There are two surfaced paths. One connects East Baldridge Drive and Barrie Street with a link to Dempster Place. The other is on the east edge of the site and is part of a path that connects High Beveridgewell and Carswell Place/Queen Ann High School. Submissions make reference to two play areas within the site. During my inspection, I noted one play area with a limited range of equipment. A tarmac area appeared to mark the location of the second play area. It had no play equipment.

5. The area proposed for residential development is part of one of the tree plantations. The trees are around three to four metres in height. So far as I could tell from a winter season inspection with trees bare of leaves, the trees are well-established and not yet fully mature.

6. At the time of my inspection, the grass areas were in good condition. The grass areas were saturated, but this was not surprising in view of a preceding period of wet weather. There was a severe litter problem alongside the path on the east edge of the site. It may be that this path is a popular route for pupils walking to Queen Ann High School and that this is related to the litter. I saw no sign of a litter problem in any other part of the site. Rundown fencing was not apparent to me. It may be that the plantation areas had been fenced to protect young trees. As mentioned, the trees are now well-established. They do not require protective fencing.

7. It is submitted that the site, as an open space, is underused. I find that use is likely to be increased if surfaced paths were provided across more of the site, if the one play area were upgraded and if this play area were also extended or a second play area reinstated. These kinds of improvement and other landscape work are proposed as a concomitant of the housing development.

8. I note that other, arguably more attractive, open spaces are available in the wider surrounding area. I find that the site at East Baldridge Drive has the advantage of being close to a considerable residential area from which it may be reached without need to
9. I find that the site in its present condition makes a positive and significant contribution to local amenity. As the woodland areas continue to mature, they may be expected to make an increasing contribution to this amenity and to biodiversity. The comprehensive landscape improvement described in the representation would maximise the attractiveness of part of the site (the part not proposed for housing), but some more modest improvements would go a long way to maximising the attractiveness of the site as a whole. Scottish Planning Policy says that planning should protect, enhance and promote green infrastructure, including open space (paragraph 220).

10. Regarding access, I note the following. Concern is expressed about use of Myrtle Wynd as one means of access to the proposed development. The council has not identified access as a reason for opposing the proposed development. When the Queen Anne Gate development was planned, provision was made for a right of access to the site of the proposed development from Myrtle Wynd. There is a possibility of additional vehicle access from other adjoining roads. My conclusion is that it appears that satisfactory access to the proposed site could be provided.

11. Regarding land ownership, I find that the proposed development site is within the ownership of Avant Homes. The company’s ownership is less extensive than indicated in the original representation, but I do not find that this is likely to have any significant impact on the proposed development or on the effectiveness of the site were it to be allocated for housing.

12. Scottish Planning Policy also emphasises the need to identify enough land for housing development. The need to achieve and maintain an adequate supply of housing land is clearly of great importance. I also note the contention that the proposed housing development would accord with Policy 7 in SESplan.

13. I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the five-year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under Issue 2(b) Homes with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that this site would nevertheless be unacceptable because:

   the proposed housing development would entail a serious loss of open space which would be detrimental to local amenity; and

   this loss would not be offset by the proposed improvements to the retained area of open space and the contribution that the proposal would make to the housing land supply.

My conclusion is that the proposed plan need not be altered.

14. Representation 1696 seeks a land allocation that would permit construction of some 300 dwellings at Middlebank Smallholdings. In considering this representation, I have had regard to responses to a request for further information (FIR 22).
15. Representation 1696 acknowledges that the focus for new residential development in Dunfermline is to the north, north-west and south-west of the town. It is contended that land for more than 7,830 houses is tied up in strategic allocations and that, to date, no built development has taken place. There is a need to allocate additional effective sites to deal with a present and projected delivery shortfall.

16. I note that the spatial strategy of SESplan says that, where possible, new housing development is to be focused on brownfield land and on the thirteen strategic development areas (SESplan, paragraph 22). Limited resources for development and for supporting infrastructure will be major challenges (paragraph 24). In terms of infrastructure, local development plans should make provision for priority strategic interventions (paragraph 28). These interventions include the Dunfermline northern relief road and the Dunfermline western distributor road (figure 2).

17. Local development plans are to direct further strategic development to the thirteen strategic development areas (SESplan, Policy 1a). In the case of Fife, this means that strategic development is to be directed to North Dunfermline and to the Ore/Upper Leven Valley. Committed allocations are to be augmented with new strategic-scale development focused on these two strategic development areas (SESplan, page 23 and paragraph 67).

18. The SESplan Supplementary Guidance Housing Land of May 2014 says that new development proposals will complement and not undermine the delivery of existing committed development (paragraph 3.11).

19. I find that the proposed plan accords with SESplan strategy in that allocations on land to the north, west and south-west of Dunfermline are retained (site DUN 035) and are augmented by new allocations on land to the north of Dunfermline (sites DUN 038 to 046). Development on all this land requires provision of infrastructure. This includes not only the two roads mentioned above but also other infrastructure such as schools.

20. Representation 1696 envisages construction of some 300 dwellings at Middlebank Smallholdings. In terms of marketability, it is contended that the site lies within a well-established area for both developers and buyers (representation 1696, document 6 - Site Effectiveness Assessment). It is also contended that the site is largely free from infrastructure constraints.

21. Ordinarily, the two factors just mentioned would be seen as favouring development. In the present case, and bearing in mind that resources for development and for supporting infrastructure are limited and will be major challenges, I find it likely that the proposed housing development at Middlebank Smallholdings would deflect investment from delivery of the existing committed development on land to the north, west and south-west of Dunfermline. Development in this latter area requires investment in major items of infrastructure. The same applies to development on sites DUN 038 to 046. In both cases, development is more likely to proceed if developers and suppliers of development finance are confident that the housing sites strategy for Dunfermline as set out in the proposed plan will be adhered to. The proposed development at Middlebank Smallholdings would be a major departure from the housing sites strategy for Dunfermline.
22. In conclusion, I find that the proposed housing at Middlebank Smallholdings would not be on land where there is an existing commitment to development and would not be within the North Dunfermline strategic development area. It would not complement delivery of housing on the strategic sites identified in the proposed plan. On the contrary, it would undermine delivery of housing on these sites. For all these reasons, the proposed housing at Middlebank Smallholdings would not accord with SESplan strategy.

23. It is the view of the council that the proposed development would have environmental impacts on the landscape setting of Dunfermline and the gateway to Fife. In the site assessment, visual impact issues include “Site highly visible in distant views from S - A823 sliproad/ M90/Forth Bridgehead, Rosyth and Letham Hill/Spencerfield area of Inverkeithing - forms key part of landscape setting for [Dunfermline]”.

24. The Vision Document accompanying representation 1696 includes a visual appraisal and an illustrative master plan. The Vision Document says that there would be “good landscape fit”.

25. From the submissions and from my inspection of the area, I find that the most significant landscape effect of development on the Middlebank Smallholdings site would be the change in appearance experienced by northbound travellers on the A90 road. This is because from this road a large part of the site is visible and the road is used by many persons. In contrast, from roads near to the site, topography and trees mean that only relatively small parts of the site are visible from individual viewpoints along roads that are much less busy.

26. From the A90, the western part of the site is the most prominent. It comes into view at the point where the A90 passes beneath the bridge that carries Dunfermline Wynd. It is seen almost straight ahead. Trees and topography restrict views of the eastern parts of the site. From the Dunfermline Wynd bridge the site is at a distance of about two kilometres. It remains in view from a relatively short section of road. The road bends gradually to the right (becoming the M90) and roadside trees and then topography restrict visibility in the direction of the site.

27. A marked feature of the site’s setting as seen from the A90 road is built development. This includes the eastern edge of Rosyth, commercial development at the eastern end of the Carnegie Campus, and housing on or near the skyline, from the Dovecot Place-Merlin Drive locality eastwards to the Stewart Crescent locality.

28. The illustrative master plan contained in the Vision Document shows much of the western part of the site as a parkland with a sports pitch and tree planting. I find that this would significantly reduce the impact of development on the landscape setting of Dunfermline. I find that generous tree planting within this parkland area and elsewhere within the site - especially along its southern side - could further reduce landscape impact to an acceptable level.

29. Regarding other viewpoints specified by the council, from my inspection I find that views of the site from the westbound A823(M) slip road are limited and are off to the right. Views of the site from the A921 in the vicinity of Spencerfield are very largely prevented by a substantial roadside hedge on the north side of the road. Views towards the site are possible only from a relatively short length of the A921 in the vicinity of the Hillend Road junction traffic signals. The site is at a distance of some 1.8 kilometres.
Development accompanied by sufficiently generous landscaping would not have an unacceptable impact on views from here. Letham Hill is wooded and views from it are likely to be limited by the tree-cover.

30. From all the foregoing, I find that impacts on the landscape setting of Dunfermline and the gateway to Fife would not be unacceptable and are not a reason for rejecting development on the Middlebank Smallholdings site.

31. The council refers to access issues. The site assessment says “vehicular access from Masterton Road may be possible, but entire length of road between the bypass (Skylark Road) and B981 will have to be upgraded”. Representation 1696 contends that the accompanying Transport Assessment “confirms that road access is not a constraint to the development”.

32. In the Transport Assessment, one of the scenarios for the development options matrix includes an extension to the existing shared pedestrian cycle footway on Masterton Road eastward to the B981 junction. A number of benefits are ascribed to this option, but in the scoring matrix it comes last because of land take and cost factors. It is not included in the proposed package of mitigation measures.

33. The Transport Assessment includes an analysis of peak hour trip distribution. It seems to me that trips assigned to M90 south, B981 north and Inverkeithing would all use Masterton Road eastwards from the site to B981. Thus 64% of peak hour trips would use this section of road. Personal injury accident data for the five years from 2008 to 2012 records one accident (slight injury) on this section of road. The accident was at the junction with B981.

34. The Transport Assessment contains no survey and analysis of existing traffic flows along the southern part of Masterton Road. Thus there is no information as to the delays, if any, that already occur when vehicles seek to exit Masterton Road and join B981. From this it follows that there is no information as to what extent additional traffic from the proposed development might cause or add to congestion.

35. From my inspection, I note that Masterton Road between the site and B981 is of minimal width for two-way traffic. It has limited forward visibility at two fairly sharp bends. There is no footway provision. I find that it has not been demonstrated that it is suitable for use by additional vehicular traffic.

36. I find that Masterton Road between the site and B981 would neither be perceived as a safe route for cyclists nor be attractive to cyclists if it were also used by a significant volume of motorised vehicles. If, as is indicated in the Transport Assessment, land acquisition is required for improvement, I find that, without availability of public finance and some assurance that the land acquisition could proceed, improvement is not likely to be a practical proposition. Without improvement, there would be conflict with the need to provide safe and convenient opportunities for cycling (Scottish Planning Policy, paragraphs 270 and 273).

37. My conclusion is that the proposed development would have an undesirable effect on the local road network.

38. The council refers to education issues. Representation 1696 refers to the accompanying Education Issues document. It is contended that, with regard to non-
denominational primary education, the site is within the catchment area served by Pitreavie Primary School and that this school presently has sufficient capacity to cater for demand arising from 300 new dwellings at Middlebank. If additional capacity is required at this school because of new housing development on the south-west side of Dunfermline, or if additional capacity is required at the nearer but full Masterton Primary School, the developer is willing to make a contribution to the costs of additional accommodation. The developer is also willing to make a contribution to necessary additional accommodation for secondary education.

39. Scottish Planning Policy says that the planning system should support patterns of development that provide safe and convenient opportunities for walking. Plans should support development in locations that allow walkable access to local amenities (paragraphs 270 and 273). The Transport Assessment refers to the generally accepted view that children are prepared to travel up to 20 minutes on foot to access their school.

40. I note from figure 4-1 in the Transport Assessment that Pitreavie Primary School is well beyond the area that is within a 20-minute walk from the proposed site.

41. I note that a number of the Dunfermline housing sites identified in the proposed plan include additional school accommodation as one of the development requirements.

42. From the foregoing, I find that, at the present time, lack of school accommodation is not a reason for rejecting new housing development at Middlebank Smallholdings. Any lack of school places is an issue that may well be capable of being resolved. What does pose a difficulty is the distance between the site and Pitreavie Primary School. This distance would make it likely that a large proportion of primary school pupils would not walk to school.

43. My conclusion is that housing development on the site would not be suitably accessible to the Pitreavie non-denominational primary school.

44. Opponents of housing development at Middlebank Smallholdings raise concerns about impact on the Inverkeithing battlefield site and loss of agricultural land.

45. The site of the second battle of Inverkeithing is included in Historic Environment Scotland’s inventory of battlefields. Middlebank Smallholdings are within the designated battlefield site. As is apparent from Issue 2h of this examination report, Historic Environment Scotland is not opposed in principle to development within the battlefield site. The site assessment for the Middlebank Smallholdings site does not record any objection from Historic Environment Scotland.

46. From the considerations in the preceding paragraph, I find that, if the Middlebank Smallholdings site were to be allocated for development, concern about impact on the Inverkeithing battlefield site could be adequately addressed by a requirement that design of development have regard to the landscape characteristics and special qualities of the battlefield site.

47. Regarding loss of agricultural land, the site assessment says that the site is not prime quality agricultural land. I find that loss of agricultural land is inevitable in meeting the established need for housing land at Dunfermline. I conclude that loss of agricultural land is not a reason for rejecting development on the Middlebank Smallholdings site.
48. I find that other matters raised in representations do not have a significant bearing on whether land at Middlebank Smallholdings should be allocated for housing development.

49. I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the five-year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under Issue 2(b) Homes with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that housing development on the Middlebank Smallholdings site would nevertheless be unacceptable because (i) it would conflict with SESplan strategy, (ii) it would conflict with the housing sites strategy for Dunfermline, (iii) it would have an undesirable effect on the local road network and (iv) it would be too far from non-denominational primary school facilities. These adverse impacts would outweigh the benefits of addressing any shortfall. I conclude that the site should not be allocated for housing development.

Dunfermline and Halbeath, non-allocated site - Longriggs (LDP-DUN002)

50. The eastern boundary of the Longriggs site adjoins the Middlebank Smallholdings site. As noted in the preceding Middlebank Smallholdings section, SESPlan says that local development plans are to direct further strategic development to the strategic development areas, one of which is north Dunfermline. In addition, development on the previously-identified strategic area to the north, west and south-west of Dunfermline is to continue to be supported. Limited resources for development and for supporting infrastructure will be major challenges. Development of Dunfermline’s strategic sites requires provision of major items of infrastructure.

51. The SESPlan Supplementary Guidance Housing Land of May 2014 says that new development proposals will complement and not undermine the delivery of existing committed development. In the present case, the representation draws attention to table 3.2 of the guidance. This shows that provision should be made for 1,950 new dwellings on sites in Fife but outwith the strategic development areas.

52. I accept that the envisaged development of some 50 dwellings is not of strategic scale. Nevertheless, I find that it would be a significant addition to the still-to-be-developed housing sites in the Dunfermline eastern expansion area. I find it likely that the proposed development at Longriggs would deflect investment from delivery of the existing committed development on land to the north, west and south-west of Dunfermline. As already noted, development in these areas requires investment in major items of infrastructure and the same applies to development on sites DUN 038 to 046. In both cases, development is more likely to proceed if developers and suppliers of development finance are confident that there will be adherence to the housing sites strategy for Dunfermline, as set out in the proposed plan.

53. I find that the proposed housing at Longriggs would not be on land where there is an existing commitment to development and would not be within the North Dunfermline strategic development area. It would not complement delivery of housing on the strategic sites identified in the proposed plan. On the contrary, it would undermine delivery of housing on these sites. The proposed housing at Longriggs would therefore not accord with SESPlan strategy and would be a significant departure from the housing sites strategy for Dunfermline as set out in the proposed plan.
54. The representation contends that the site, in conjunction with the business allocation to the south and west, represents a defensible eastern boundary for urban development in this location. It contends that the visual impact of development on the site, taken in context, would be limited and beneficial.

55. I find that the proposed houses would result in a relatively narrow tongue of built development projecting southwards from the present boundary of residential development defined by Merlin Drive. The proposed development would be separated from Merlin Drive by the substantial pond and surrounding open space that are located between Merlin Drive and the north boundary of the site. To the east is the agricultural land associated with Middlebank Smallholdings. To the west, on the other site of Skylark Road, is a field. I find that allocating the site for housing would result in an unsatisfactory settlement boundary. Far from being defensible, such a boundary would be likely to result in increased and harder-to-resist pressure to permit development on adjoining land.

56. From my inspection of the surroundings, I find that the chief landscape effect of development on the Longriggs site would be on the view experienced by north-bound travellers on the A90. The site would come into view where the A90 passes beneath the Dunfermline Wynd bridge and would be seen almost straight ahead. From the Dunfermline Wynd bridge the site is at a distance of about two kilometres. It remains in view from a relatively short section of road.

57. I find that, at present, one of the features of the view from the A90 is the housing that occupies the skyline. In front of this apparent line of housing is a down-slope of largely open ground. The development envisaged in the representation would create a salient of built development projecting into this down-slope. I find that this would result in a discordant and unattractive pattern of development.

58. I note that the representor is willing to contribute to affordable housing and necessary education improvements. The council says that there is a requirement for a minimum of two vehicular accesses from Skylark Road, and this will be difficult to provide with adequate junction spacing. The representor says there is no need for two points of access. From the limited information available, I am not convinced that access is an insuperable difficulty.

59. The representor argues that development on the site would help meet established need for housing land. I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the five-year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under Issue 2(b) Homes with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that the Longriggs site would nevertheless be unacceptable because of (i) conflict with SESplan strategy, (ii) conflict with the proposed local development plan’s strategy for Dunfermline and (iii) landscape considerations. These adverse impacts would outweigh the benefits of addressing any shortfall.

60. I conclude that the proposed plan should not be altered.

Dunfermline and Halbeath, non-allocated site - Masterton Farm (LDP-DUN011) and Masterton Site 2 (LDP-DUN013b)

61. The Masterton Farm site is candidate site LDP-DUN011. It is half of a hectare in
extent and adjoins the edge of the built up area between Skylark Road and Masterton Road. Masterton Site 2 adjoins the Masterton Farm site and extends southwards, with Masterton Road on its south-west side and Skylark Road on its east side. Masterton Site 2 has an area of some two hectares. On the other side of Skylark Road is the Longriggs site. Representation 2034 and representation 2051 are in similar terms. Both representations refer to both sites.

62. It is contended that allocating the two sites for housing would be entirely consistent with SESplan requirements for the FIFEplan strategy.

63. As noted in the two preceding sections, SESplan says that local development plans are to direct further strategic development to the strategic development areas, one of which is north Dunfermline. In addition, development on the previously-identified strategic area to the north, west and south-west of Dunfermline is to continue to be supported. Limited resources for development and for supporting infrastructure will be major challenges. Development of Dunfermline’s strategic sites requires provision of major items of infrastructure.

64. The SESplan Supplementary Guidance Housing Land of May 2014 says that new development proposals will complement and not undermine the delivery of existing committed development. The guidance also says that provision should be made for 1,950 new dwellings on sites in Fife but outwith the strategic development areas.

65. The representations contend that delivery of housing on the Dunfermline strategic sites has been repeatedly delayed. Development on the Masterton sites could help make good the consequent shortage of effective housing sites. The sites would accommodate a non-strategic scale of development that would be consistent with the SESplan spatial strategy and that would avoid any prejudice to implementation of the strategic development areas strategy under FIFEplan.

66. I estimate that the two sites are large enough to contain very roughly 50 dwellings. I accept that this would not be development on a strategic scale. Nevertheless, I find that it would be a significant addition to the remaining housing sites in the Dunfermline eastern expansion area. I find it likely that development on the Masterton sites would deflect investment from delivery of the existing committed development on land to the north, west and south-west of Dunfermline. As already noted, development in these areas requires investment in major items of infrastructure and the same applies to development on sites DUN 038 to 046. In both cases, development is more likely to proceed if developers and suppliers of development finance are confident that there will be adherence to the housing sites strategy for Dunfermline, as set out in the proposed plan.

67. I find that the proposed housing at Masterton would not be on land where there is an existing commitment to development and would not be within the North Dunfermline strategic development area. It would not complement delivery of housing on the strategic sites identified in the proposed plan. On the contrary, it would undermine delivery of housing on these sites. The proposed housing at Masterton would therefore not accord with SESplan strategy and would be a significant departure from the housing sites strategy for Dunfermline as set out in the proposed plan.

68. I agree that the key visual receptor vantage point relating to the southern gateway is the A90-M90 corridor. As indicated in the representations, woodland within the
Carnegie Campus provides some screening of the southern part of the larger site. Nonetheless, housing on the site would be largely visible and would be seen from the A90. I find that, at present, one of the features of the view from the A90 is the housing that occupies the skyline. In front of this apparent line of housing is a south-facing slope of largely open ground. The development envisaged in the representation would extend forward from the skyline houses, descending the slope. I find that this would result in a discordant and unattractive pattern of development, even with the suggested structural landscaping along the Skylark Road frontage.

69. I note that development will be taking place on land to the west of Masterton Road (site DUN 030). This land is more contained by its surroundings. Development on it would not alter my assessment of the landscape effect of development on the representation sites.

70. It is contended that the settlement boundary is relatively weakly defined by Masterton Road and that a settlement boundary encompassing the representation sites would form a strong and defensible settlement edge. From my inspection, I note that the adjacent section of Masterton Road has, along various stretches, hedging, trees and stone walls. By contrast, the adjacent section of Skylark Road lacks any landscape feature apart from a post-and-wire fence on its west side. My conclusion is that development on the representation sites would not create an opportunity to improve the alignment of the settlement boundary.

71. The representations say that it would be inappropriate for issues relating to primary school capacity to be considered as a constraint on the allocation of the sites at Masterton. I note the reasoning contained in the representations. This is not disputed by the council in its response. I find that school capacity, or lack of capacity, is not a matter that counts against allocating the sites for housing.

72. It is contended that allocating the representation sites for housing would facilitate development on adjoining land to the west, which is within the settlement boundary and which is shown in the proposed plan as a housing opportunity site (DUN 030).

73. I find that allocating the representation sites for housing development might make it easier to develop site DUN 030, but submissions do not demonstrate that site DUN 030 cannot be developed on its own. My conclusion is that this aspect of the representations adds little weight to the case for development on the two Masterton sites.

74. Generally, the representations present a single case for development on both sites. One exception to this is the contention that a sensitive development of five dwellings on the smaller, Masterton Farm site would simply be perceived as preserving the existing character of the settlement edge in terms of landscape setting.

75. From my inspection, I note that there are mature trees in or on the boundary of the Masterton Farm site. The trees are an attractive feature in the view seen by persons travelling towards Dunfermline on that part of Skylark Road north of its junction with Masterton Road. Development on the Masterton Farm site could well require removal of, or threaten the continued existence of, some or all of the trees. Loss of the trees would be detrimental to the quality of the local landscape.

76. The representations refer to the housing land requirement and the extent to which the proposed plan does, or does not, identify sufficient housing land. I recognise that the
Proposed Fife Local Development Plan

council’s 2015 Housing Land Audit identifies a shortfall in the five-year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under Issue 2(b) Homes with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that the Masterton sites would nevertheless be unacceptable because of (i) conflict with SESplan strategy, (ii) conflict with the proposed local development plan’s strategy for Dunfermline and (iii) landscape considerations. The adverse impacts would outweigh the benefits of addressing any shortfall. It would not be appropriate to allocate the two sites for housing development, nor would it be appropriate to allocate only the Masterton Farm site. The proposed plan should not be altered.

Dunfermline and Halbeath, non-allocated site - Dunlin Drive

77. I note that the site is within the settlement envelope for Dunfermline and that planning permissions have been granted for a mix of commercial, care home and community uses. The development opportunity designation that is now sought would indicate that a somewhat wider range of development would be acceptable, including housing.

78. The site is within the Eastern Expansion Area, where a large amount of new housing has been constructed. Further housing development is in progress.

79. The site is beside the roundabout where Pittsburgh Road joins Dunlin Drive. Both of these roads are distributor roads. The site has good “visibility” and accessibility. These characteristics no doubt encouraged the owner to pursue the commercial and community uses for which planning permission has been granted.

80. As pointed out in the representation, there is housing development to the south, west and north of the site. From my inspection, I note that the housing to the north is set well back from the roundabout. Landscaped areas adjoin both sides of Pittsburgh Road on its approach to Dunlin Drive. It may be that some complementary landscaping might be desirable within the representation site. I am not aware of whether consideration has been given to this and whether it might affect the number of dwelling that could be satisfactorily accommodated within the site.

81. The representation says that the site offers potential as a housing opportunity, with an indicative capacity of 25 dwellings. While this may be a relatively small number in comparison to the scale of development in the Eastern Expansion Area, it has not been demonstrated to me that essential infrastructure, including school provision, is available or can be made available. Nor has it been shown that the site is not needed for community and commercial uses or that any need for such uses can be provided elsewhere.

82. I note the lack of success to date in attracting someone who would develop the site in accordance with the planning permissions that have been granted. As the economy recovers from the financial crisis of 2008 and as more residents move into the Eastern Expansion Area, I find that the site may become more attractive as a location for community and commercial uses, and a developer may then come forward.

83. Neither the representation nor the council’s response demonstrates that a structured environmental assessment process has been undertaken with regard to the wider range of development now sought for the site. Nor is there evidence of public
engagement. Circular 6/2013: Development Planning, at paragraph 118, says: “Reporters require adequate environmental information to be provided to them, together with evidence arising from public engagement, without this they will be unable to recommend modifications to the plan on particular sites.” In the present instance, I find that I do not have this information and evidence.

84. I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the five-year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under Issue 2(b) Homes with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that a housing allocation for the Dunlin Drive site at this time would nevertheless be unacceptable because of the findings in the preceding paragraphs. These findings outweigh the benefits of addressing any shortfall.

85. I conclude that the proposed plan should not be altered.

Dunfermline and Halbeath, non-allocated site - 60a Carnock Road

86. Under Issue 7a(2), I am recommending that site DUN 045 be deleted and that the settlement boundary be redrawn. The new settlement boundary would go along Carnock Road. This means that the representation site at 60a Carnock Road would remain within the settlement boundary. The council points out that inclusion within the settlement boundary means that there will be a presumption in favour of development.

87. No indicative site layout or other information has been submitted to demonstrate the feasibility of additional development on the representation site. In particular, it has not been demonstrated that acceptable access arrangements can be made.

88. The representation contains no evidence to show that a structured environmental assessment process has been undertaken. Nor is there evidence of public engagement. Circular 6/2013: Development Planning, at paragraph 118, says: “Reporters require adequate environmental information to be provided to them, together with evidence arising from public engagement, without this they will be unable to recommend modifications to the plan on particular sites.” In the present instance, I find that I do not have this information and evidence.

89. I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the five-year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under Issue 2(b) Homes with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that a housing allocation for the Carnock Road site at this time would nevertheless be unacceptable because of the findings in the two preceding paragraphs. These findings outweigh the benefits of addressing any shortfall.

90. Inclusion of the representation site within the settlement boundary goes some way to meeting the concern in the representation. The council makes the point that the site would be subject to further detailed assessment against relevant policies if an application for planning permission were to be made.

91. My conclusion is that the proposed plan need not be altered.
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<tr>
<th>Reporter's recommendation:</th>
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<td>No modifications.</td>
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<td>Issue7a(4)</td>
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<td>Development plan reference:</td>
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<td>Reporter:</td>
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<td>Body or person(s) submitting a representation raising the issue (including reference number):</td>
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<tr>
<td>Ross Riddock (39)</td>
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<td>Joan O'Donovan (132)</td>
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<td>Derek Garrick (141)</td>
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<td>Ken Patrick (192)</td>
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<td>Sandra Gilmour (652)</td>
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<td>Central Dunfermline Community Council (1367)</td>
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<td>Bellyeoman Community Council (2941)</td>
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<td>Alice Smillie (3816)</td>
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<td>Mark Valentine (NHS Fife) (3845)</td>
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<td>Provision of the development plan to which the issue relates:</td>
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<td>Planning authority’s summary of the representation(s):</td>
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<tr>
<td>Ross Riddock (39): The plan does not show developments at Clunie Road, Bute Crescent, Allan Crescent/Islay road or Nith Street.</td>
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<td>Joan O'Donovan (132): Concerned about the continuing deterioration of the west end of Dunfermline’s central area. Commercial properties should be converted to residential uses to improve the commercial and social prospects of the area, as it is unlikely Dunfermline will be able to attract enough good quality shops to this location. There should also be further renovation of Victorian buildings to restore some of Dunfermline’s lost architectural dignity.</td>
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<td>Derek Garrick (141): Recent road markings along Sandpiper Road have turned it into an unofficial lorry park which is unacceptable. FIFEplan does not refer to this use. Fife Council should take action to remove these vehicles from Duloch.</td>
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<td>Dr Ken Patrick (192): The only way to lower the NOx levels (along Appin Crescent) is to reduce the volume of slow moving traffic. There is a real risk to the health of children in the nearby affordable housing. Previous experience leads to the following suggestions: Traffic accessing Dunfermline town centre should be directed to junction 2 of the M90. Access to the Leys Car Park should be from the mini roundabout at the junction of Garvock Hill and Halbeath Road. The pedestrian crossing at Couston Street should be replaced with a crossing at the next set of traffic lights.</td>
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<tr>
<td>Sandra Gilmour (652): Object to how the original plans for development at Allanwater, Carnock Road have been changed (apparently easily) without enough additional payment and sanctions. The local residents have not been given enough information regarding why the original plans were discarded and are uncomfortable with the</td>
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Central Dunfermline Community Council (1367): The area from Mill Hill Street to Blacklaw Road (known as Rex Park) should be identified as protected open space, to reflect its longstanding status as a recreation area and the recent improvement works that have been carried out.

Appin Crescent has an extreme air pollution problem. FIFEplan does not include any proposals to help address this problem; it only includes the suggestion of other infrastructure routes (DUN 067 Northern Link Road/DUN 068 Western Distributor) which would not have a significant impact on DUN065 Appin Crescent Bypass issues. FIFEplan just considers local infrastructure provision for development proposals; it does not consider current/related infrastructure problems - specifically the effects of increased traffic volumes from 10,000+ new homes increasing air pollutants at Appin Crescent. Text should be added regarding ‘Consideration for DUN065 Appin Crescent Bypass’ to the following proposals DUN 067 Northern Link Road, DUN 043 Halbeath, DUN 029b Lynebank Hospital, DUN 021 South Fod Farm, DUN 047 Halbeath South, DUN 017 East Dunfermline (North B), DUN 006 Campbell Street, DUN 008 East Dunfermline North (F), DUN 039 North Dunfermline (Colton), DUN 035 Dunfermline N/W/SW, to help resolve this problem. Alternatively we would request a formal response as to how Fife Council intends to address the problem/root-cause of increased traffic/pollution at Appin Crescent resulting from the proposed development plan? The proposed developments should not proceed until the air quality issue at Appin Crescent is mitigated, FIFEplan does not do this at present.

Bellyeoman Community Council (2941): Object that the parkland areas off Alderston Drive and Bellyeoman Road in Dunfermline and the park space to the north of Townhill have not been designated as protected open spaces.

Alice Smillie (3816): Object to the FIFEplan for the following reasons:- we need a new road round Dunfermline; we need more car parking in town; Queen Margaret Fauld site is still is not finished and has no bus.

NHS Fife (3845): Potential additional 3000 houses in local area will impact on healthcare services. Note the reference in draft plan for healthcare services requirement. Understanding of timescale for developments would assist in planning of potential changes in delivery of healthcare services.

**Modifications sought by those submitting representations:**

Ross Riddock (39): Include developments at Clunie Road, Bute Crescent, Allan Crescent/Islay road or Nith Street in the plan.

Joan O'Donovan (132): Commercial properties should be converted to residential uses to improve the commercial and social prospects of the area. There should also be further renovation of Victorian buildings to restore some of Dunfermline's lost architectural dignity.

Dr Ken Patrick (192): Traffic accessing Dunfermline town centre should be directed to junction 2 of the M90. Access to the Leys Car Park should be from the mini roundabout at the junction of Garvock Hill and Halbeath Road. The pedestrian crossing at Couston
Street should be replaced with a crossing at the next set of traffic lights.

Central Dunfermline Community Council (1367): Designate the area from Mill Hill Street to Blacklaw Road (known as Rex Park) as protected open space. Add text regarding ‘Consideration for DUN065 Appin Crescent Bypass’ to the following proposals DUN 067 Northern Link Road, DUN 043 Halbeath, DUN 029b Lynebank Hospital, DUN 021 South Fod Farm, DUN 047 Halbeath South, DUN 017 East Dunfermline (North B), DUN 006 Campbell Street, DUN 008 East Dunfermline North (F), DUN 039 North Dunfermline (Colton), DUN 035 Dunfermline N/W/SW.

Bellyeoman Community Council (2941): Identify the parkland areas off Alderston Drive and Bellyeoman Road in Dunfermline and the park space to the north of Townhill as protected open spaces.

Alice Smillie (3816): Designate a new road around Dunfermline. Designate more car parking in town.

Summary of responses (including reasons) by planning authority:

Ross Riddock (39): Noted, however, Fife Council is not aware of any development proposals over 5 units proposed in these areas.

Joan O’Donovan (132): Local Development Plan policies support conversation of properties and support town centre regeneration (see Policy 6 - Town Centres First, page 210, and Policy 14 - Built and Historic Environment, page 244, CD5).

Dr Ken Patrick (192), Derek Garrick (141): It is the intention that the Strategic Development Areas will deliver a Western Distributor, with the aim of allowing a north south movement of traffic down the western edge of Dunfermline. Traffic accessing the town centre could use the Admirality Junction (Junction 2). Part of the transport interventions required by the Local Development Plan to deliver strategic development includes the improvements at Pitreavie Roundabout (see Proposal DUN 070 Pitreavie Roundabout). Detailed suggestions with regard to local traffic management are too detailed for a Local Development Plan; however the comments have been forwarded to transportation colleagues for information and appropriate action.

Sandra Gilmour (652): This site was allocated as an employment site in the Dunfermline & West Fife Local Plan (see CD8, Dunfermline Settlement Proposal Map). The Proposed Plan has removed the employment land designation from the western part of the site to reflect a committee approval for 43 dwellinghouses, care home and retail building (12/00693/FULL). A further application has been received for the erection of 18 residential units (3 private, 15 affordable) with associated infrastructure and landscaping (as an amendment to planning permission 12/00693/FULL (see 15/00502/FULL). This application is currently under consideration.

Central Dunfermline Community Council (1367): Air quality issues at Appin Crescent are addressed in local plan Proposal DUN 065 Appin Crescent Bypass (CD5, page 78) which states that the proposal is intended to address the air quality objectives, as identified by the Air Quality Management designation. It is, therefore, not considered necessary to include a reference to DUN 065 in surrounding development proposals.
Rex Park should be designated as protected open space. This has been recorded as a correction to be made in the adopted version of the Plan.

Bellyeoman Community Council (2941): Parkland areas off Alderston Drive and Bellyeoman Road in Dunfermline and the park space to the north should be designated as protected open space. This has been recorded as a correction to be made in the adopted version of the Plan.

Alice Smillie (3816): A suite of transportation interventions aimed at supporting the delivery of the strategy are proposed for Dunfermline (see Proposals DUN065 –Appin Crescent Bypass; DUN 067 Northern Link Road; DUN 068 Western Distributor; DUN069 Bothwell Gardens Roundabout; and DUN 070 Pitreavie Roundabout). These interventions are proposed as a result of the Dunfermline Transport Assessment (CD56), undertaken in 2011 to inform the Dunfermline & West Fife Local Plan 2012 (CD8). A Strategic Transport Appraisal (CD19) has also been completed which tests the ability of the trunk road network to accommodate the proposed development.

**Reporter's conclusions:**

**Dunfermline and Halbeath - miscellaneous - omission of development sites**

1. Only sites which can accommodate five or more dwellings are shown on the proposals map. Smaller sites are not shown. I find that this accords with the spirit of Circular 6/2013: Development Planning, which says that plans should be succinct and concise (paragraphs 8 and 79). In the case of the sites listed in the representation, it has not been demonstrated that lack of designation on the proposals map will have any adverse effect on the way in which they might be developed. Taking all of these points into account, my conclusion is that the proposed plan need not be altered.

**Dunfermline and Halbeath - miscellaneous - west end of Dunfermline central area**

2. Thriving town centres is the outcome sought from Policy 6: Town Centres First. Where active marketing fails to find a retail use for premises outwith core retail areas, other uses, including residential, will be encouraged. Policy 14: Built and Historic Environment supports development which protects or enhances buildings of special architectural interest. I find that the proposed plan supports and encourages the kind of development sought in the representation. My conclusion is that the plan need not be altered.

**Dunfermline and Halbeath - miscellaneous - lorry parking**

3. The representation does not say what change should be made to the proposed plan to address the concern regarding lorry parking. If parking of lorries on Sandpiper Road is causing an obstruction or hazard, it may be that the matter should be referred to the Police. I note that the council has forwarded the representation to transportation officials. It may be that they can take any action that is needed. My conclusion is that the proposed plan need not be altered.

**Dunfermline and Halbeath - miscellaneous - Appin Crescent**

4. It seems to me that the amount of new development proposed for Dunfermline is
such that there could be significant traffic effects on many of the town’s distributor roads, including Appin Crescent. This in turn could increase impact on air quality. For these reasons, I find that the concern about air quality at Appin Crescent is justified.

5. I note that the proposed plan contains proposal DUN 065 - Appin Crescent Bypass. Simply including this proposal in the plan does not necessarily mean that it will be implemented.

6. The plan should ensure that the air pollution impact of additional traffic on Appin Crescent is not overlooked. When proposals to develop the strategic sites come forward, the traffic assessments that are to be carried out should include assessment of the effects of traffic on air quality. This would identify whether the Appin Crescent Bypass should be constructed or whether any other measures, including traffic management, should be implemented to address air quality issues at this location. The proposed plan should be altered accordingly.

Dunfermline and Halbeath - miscellaneous - Allanwater, Carnock Road

7. The employment area designation in the current adopted local plan extends further west than the corresponding designation in the proposed plan. The council has explained that proposals for residential and retail use have been granted planning permission. During my site inspection, I noted that construction of houses has begun. In my view it is appropriate to remove the employment area designation from land that has permission for and is undergoing residential and retail development.

Dunfermline and Halbeath - miscellaneous - protected open space

8. Representations seek designation of a number of parkland and open space areas as “protected open space”. A similar concern is addressed in the part of this report that deals with Issue 1. In that part, under the heading “Protected open space”, it is concluded that the proposed plan should not be changed. For the same reasons as given there, I conclude that the proposed plan should not be altered regarding Rex Park and the other open spaces mentioned in the representations.

Dunfermline and Halbeath - miscellaneous - new road, car parking and bus service

9. The proposed plan recognises the need for a new road round Dunfermline in that proposals DUN 067 and DUN 068 are for a Northern Link Road and a Western Distributor.

10. Regarding parking, I am not aware of any study or other evidence that demonstrates the need for more parking in Dunfermline. Scottish Planning Policy, paragraph 273, says that plans should promote opportunities for travel by more sustainable modes in the following order of priority: walking, cycling, public transport, cars. In certain circumstances, parking restraint policies may be appropriate (paragraphs 279 and 281).

11. I note the reference to lack of a bus service. For the strategic development areas described on pages 70 and 71 of the proposed plan, detailed requirements for master plans include “public transport facilities and services”.

12. My conclusion is that the plan need not be altered in response to these concerns.
Dunfermline and Halbeath - miscellaneous - healthcare services

13. For the strategic development areas described on pages 70 and 71 of the proposed plan, detailed requirements for master plans include community services (or facilities) including health care. I find that this makes adequate provision for consideration of impact on healthcare and timescale. My conclusion is that the proposed plan need not be altered.

**Reporter’s recommendations:**

I recommend that the following modifications be made:

1. See recommendations 3 and 4 under Issue 7a(1). These recommendations incorporate requirements regarding the effects of traffic on air quality.
### Issue 7b

**Townhill**


**Body or person(s) submitting a representation raising the issue (including reference number):**

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<th>TOWNHILL</th>
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<td>David Croft (3903)</td>
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**Provision of the development plan to which the issue relates:**

FIFEplan Proposed Plan, Page 81. Proposals TWH001 Townhill Power Station Site and TWH002 Townhill Loch Car Park.

**Planning authority’s summary of the representation(s):**

Non-Inclusion of Sites: Candidate sites LDP-TWH 001 Muir Road and LDP-TWH 002 Muir Road Waxwing

Townhill Community Council (632, 633, 1454) Key issues of concern are:

- Preserving the Country Park and its environs including wildlife
- Preserving the identity of the village and avoiding coalescence with Dunfermline
- Protecting the Primary School from becoming over capacity
- Keeping an accessible and safe transport network
- Ensuring the existing infrastructure and facilities can cope with new development

Endorsed unanimously a discussion paper noting that the two sites within the village boundary that were previously “not supported”, and rejected by the Scottish Government Reporter should remain so. They are:

- FIFEplan Main Issues Report Development Strategy Consultation (CD13) LDP-TWH 001 Muir Road
- FIFEplan Main Issues Report Development Strategy Consultation (CD 13) LDP-TWH 002 Muir Road Waxwing
The proposal to construct a Northern Relief Road (DUN 067) and to route it through Townhill, is seen as a major destruction of the landscape, green space, paths, a danger to the community, infringement on the Country Park and formally requests:

- Consideration is given to an alternative route
- Sight of the updated 2011 Transport Assessment.

Wilkinson family (1199) Consider that the Proposed Plan is incorrect to dismiss Main Issues Report Development Strategy Consultation candidate site LDP-TWH002 (CD13) on coalescence, landscape or precedent grounds. Each can be adequately addressed and any impacts are more than compensated for by the sustainability, quality, choice and variety of homes/sites/environments in order to support the delivery of new housing to meet the spectrum of need.

TWH001 Townhill Power Station Site

Townhill Community Council (631, 632,) supports allocation particularly where new development can support the Country Park and visitor activity.

Paul Munro (1824) consider this an acceptable site for housing development, although more consideration should be given to the necessary support facilities - local schooling and greater local retail opportunities. Object to the proposed alignment of the link road from this site, running south of Townhill as this will create unnecessary and unwelcome barriers to access, recreation and leisure opportunities, and would increase the level of risk for local residents. It would also generate more noise and pollution for those living near the route.

SEPA (3649) support the commitment to undertake a Flood Risk Assessment for development proposals on land identified as being at risk from flooding.

David Croft (3904) proposed development will significantly encroach on Townhill Country Park encouraging coalescence with Dunfermline and be detrimental to the leisure activities within the country park. Adverse impacts include: traffic noise or increased junction traffic flows detrimental to road safety, air pollution from traffic, visual intrusion, reduced quantity and variety of wildlife

TWH002 Townhill Loch Car Park

Townhill Community Council (631, 632) seek a co-ordinated view in developing TWH002 and DUN 038 Kent Street noting that developing both would result in unacceptable coalescence between the settlements.

Lorraine Beveridge (602) Objects to future development in and around Kent Street, Chamberfield Road and north of Townhill citing infrastructure constraints, residential amenity concerns and potential coalescence or loss of character.

Paul Munro (1827) consider that industrial units are the most probable employment uses and that this would have a significant impact visual aspect of the entrance to Townhill as well as to the entrance to the Scottish Water Ski Centre site, and may also have an impact on the security of adjacent housing.

David Croft (3903) When taken together with DUN038 Kent Street, DUN039 North
Dunfermline (Colton), DUN044Land to the north of Wellwood and TWH001 Townhill Power Station Site would result in the coalescence of Wellwood, Dunfermline and Townhill adversely impacting the Townhill community. In place of the protected open space to the south east of this development plant native woodland to further enhance Townhill Country Park.

**Modifications sought by those submitting representations:**

**Non-Inclusion of Sites: Candidate sites LDP-TWH 001 Muir Road and LDP-TWH 002 Muir Road Waxwing**

Townhill Community Council (631, 1454) seek the continued exclusion from FIFEplan Proposed Plan of (FIFEplan Main Issues Report Development Strategy Consultation CD 13) LDP TWH 001 Muir Road and (FIFEplan Main Issues Report Development Strategy Consultation CD 13) LDP-TWH 002 Muir Road Waxwing.


**TWH001 Townhill Power Station Site**

Paul Munro (1824), David Croft (3904) Seek realignment of the proposed northern link road and measures to avoid the coalescence of Dunfermline and Townhill from future development in this location.

**TWH002 Townhill Loch Car Park**

Townhill Community Council (631,633), Lorraine Beveridge (602), David Croft (3903) Seek measures to avoid the coalescence of Dunfermline and Townhill from future development in this location and the re-designation of protected open space at this location to a woodland proposal.

**Summary of responses (including reasons) by planning authority:**

**Non-Inclusion of Sites: Candidate sites LDP-TWH 001 Muir Road and LDP-TWH 002 Muir Road Waxwing**

The FIFEplan Main issues Report Development Strategy candidate sites discussed (LDP-TWH001 Muir Road and LDP-TWH002 Muir Road Waxwing) have been subject to site assessment (CD 15) and were considered by the Scottish Government reporter in conducting the examination into the draft Dunfermline and West Fife Local Plan (CD 21 page 363 paragraph 3 and page 366 paragraph 10.) The conclusions drawn around urban design or landscaping concerns and the potential loss of the gap between Townhill and Dunfermline remain unchanged. As such the site is not supported within the FIFEplan Proposed Plan.

**TWH001 Townhill Power Station Site**

The allocation of this site has been carried forward from the adopted Dunfermline and West Fife Local Plan 2012 (CD 8) and is intended, in line with the Development Plan priorities, to make use of a previously developed location in a manner which can
complement and serve the adjacent country park hence the allocation within FIFEplan proposed plan for leisure and community uses.

Housing development will only be acceptable where this enables the provision or integration of leisure and community uses and care will be taken to assess any amenity impact from proposed development in detail against Development Plan policies.

The proposed alignment of the Northern Link Road (NLR) shown in the proposed FIFEplan (DUN067), has been tested within the Dunfermline Transport Assessment 2011 (CD56), undertaken to inform the adopted Dunfermline & West Fife Local Plan (2012) (CD 8). There is a preliminary design of the NLR within the Dunfermline Strategic Land Area, but no detailed design will be required until such time the NLR is required. The alignment is the result of considerations including – provide the NLR within the proposed allocated site with the works funded directly by the developer; provide the NLR within Council owned land with the works funded via a transport fund; avoid third part ownership as far as practically possible, avoid difficult engineering – the use of Council owned former mineral railway lines are ideal as the longitudinal gradient tends to be no greater than 1 in 50, and provide a route that is an attractive alternative route to existing routes; results in no increase or reduced traffic flows on existing routes and provides the primary vehicular access to allocated sites.

TWH002 Townhill Loch Car Park

To reduce the potential risk of coalescence between Townhill and Dunfermline, proposal TWH 002 Townhill Loch Car Park, allocated as an employment site, could be removed from the plan. The former car park site, which sits out with but immediately adjacent to Townhill, was allocated as a brownfield opportunity site in the Dunfermline & West Fife Local Plan (CD8, page 144), the preferred use being employment. The Proposed Plan (CD5, page 81) continues to identify the site for employment, however Fife’s Employment Land Strategy 2014 (FELS) (CD18) no longer identifies the site as required for employment. Taking all of this into account, Fife Council considers that there is merit in removing the employment designation from TWH 002 and invites the Reporter to make an appropriate recommendation on this issue.

**Reporter’s conclusions:**

**Preliminary note**

1. The summary of representations section for this issue cites three representations from Townhill Community Council. From my reading of the documentation, I find that representation 632 offers support for development on site TWH 001, representation 633 offers qualified support for development on site TWH 002 and representation 1454 opposes development on a site south of Muir Road. I find no reference to the Northern Link Road in these representations. Concerns regarding the Northern Link Road are given consideration under Issues 3b and 7a(1).

2. Representation 1199 relates to the Muir Road site, which is referenced TWH 002 on the plan accompanying the representation and is referenced LDP-TWH001 on the site.
plan supplied by the council. It is bounded to the west by residential properties on Main Street and to the east by the access track that runs past the two houses behind 29 Muir Road. The site has an area of 2.1 hectares. The representation says that the site should be allocated for limited residential development on the basis proposed, namely four homestead-style live-work residential properties with related small-holdings.

3. Nothing has been drawn to my attention to suggest that allocation of the Muir Road site for residential development would be inconsistent with SESplan.

4. The previous doubt about effectiveness arose from difficulties related to ownership issues and compliance with required roads standards. The current submission says that access to three of the four properties would be from Main Street, going past the renovated farmhouse. Access to the fourth property would be from Muir Road. The submission says that, taking existing development into account, there would be a maximum of four houses off each access.

5. The significance of there being no more than four houses per access is not explained in the submission. It may be relevant that, in Fife Council’s Transportation Development Guidelines (core document 48), the least onerous junction visibility requirements are for roads serving no more than four houses.

6. The site assessment says that the Muir Road access serving the site cannot be upgraded in accordance with the Transportation Development Guidelines in order to serve a housing development. This leaves open the question as to whether adding only one house to those already using the Muir Road access would be acceptable. The site assessment provides no council comment on the proposed access to Main Street.

7. From my inspection, I note that the access to Main Street appears to have been designed for use only by occupiers of the renovated farmhouse. The access is of single-track width, with no separate provision for pedestrians. It approaches Main Street at a slight angle and down a noticeable gradient. I find that its use by three additional houses would be less than satisfactory in terms of effect on the amenity of the existing house and in terms of safety. When account is also taken of additional non-residential traffic arising from use of the houses for work as well as for residence and arising from operation of the smallholdings, the access is clearly unsuitable.

8. Existing houses adjoining the Muir Road site are generally single-storey or one-and-a-half storeys in height. They provide a coherent and unobtrusive edge to this part of Townhill. To the south, houses in Dunfermline on the south site of Kingseat Road are a marked skyline feature. The Muir Road site makes an important contribution to the separation that exists between Dunfermline and Townhill.

9. The kind of development envisaged in the representation would be likely to result in a much less satisfactory settlement edge for this part of Townhill. Four houses spread across the northern part of the site are not likely to have the coherence evident in the existing edge to the built-up area. The live-work and smallholding aspects of the envisaged development could well result in erection of various storage and other buildings in each plot. This would all have the effect of reducing the already limited width of the gap that separates Townhill and Dunfermline.

10. Kingseat Road is at a higher level than the Muir Road site. This, combined with the southerly aspect of the site, means that the envisaged development would be
particularly noticeable by many users of Kingseat Road (though less noticeable for car occupants, whose view is restricted by the low hedge on the north side of the road). It also means that the enhanced landscaping shown in the representation would be likely to have limited effect as a screen.

11. I agree that the proposed allocation of this site for limited residential development would add to the choice and variety of sites. In the context of the large scale of housing site allocations that are proposed for north Dunfermline, I do not accept that this would be a significant addition.

12. I note that necessary services are available.

13. I conclude that the envisaged development would unacceptably reduce the width of open ground that separates Townhill and Dunfermline. It would result in a less satisfactory edge to the built-up area on the south side of Townhill. It would involve use of an unsatisfactory access. For these reasons, the proposed plan should not be altered.

**Townhill - power station site, TWH 001**

14. As noted above, concerns regarding the Northern Link Road are considered under Issue 7a(1).

15. In the proposed plan, the kinds of development allocated to site TWH 001 are similar to those allocated to it in the current adopted local plan. Since the latter plan was adopted, there has been, so far as I am aware, no change in circumstances that would justify changing the allocation.

16. The proposed plan introduces green network priorities for site TWH 001. These should help ensure that concerns regarding visual intrusion, effect on wildlife, negative impact on Townhill Country Park and coalescence are addressed. I note the suggestion that the site be returned to agricultural use, but the feasibility of this in terms of cost and existence of a local farm unit in need of, and willing to take on, additional land has not been demonstrated.

17. My conclusion is that the proposed plan need not be altered.

**Townhill - Townhill Loch car park site, TWH 002**

18. In the current adopted local plan, the preferred use for site TWH 002 is employment. The proposed plan makes a similar allocation. There is however a significant difference between the two plans. In the current plan, land to the south-west of site TWH 002 is outwith the settlement envelopes for Dunfermline and is not allocated for development. In the proposed plan, the settlement envelope for Dunfermline is extended up to the access road on the south-west side of site TWH 002. Within this extended envelope, land is allocated for development (site DUN 038 - Kent Street).

19. Site TWH 002 is not included in the Townhill settlement envelope. The reason for this is not specified. The site is separated from Townhill by the line of the old railway. This is now a route for pedestrians and cyclists and is also part of the indicative line of the Northern Link Road.
20. Development on site TWH 002 could not be easily integrated into the built-up area of Townhill if the two are to be separated by the Northern Link Road. As seen from Townhill Road, site TWH 002 has a wooded appearance. On the opposite side of the road are the fields that lie between Townhill and Kingseat Road. Site TWH 002 makes an important contribution to the countryside character of this tract of land. The tract separates Townhill and Dunfermline. Development on site TWH 002 as envisaged in the proposed plan would result in a significant intrusion into this tract, reducing its effectiveness in keeping Townhill distinct from Dunfermline.

21. I note that the Fife Employment Land Strategy 2014-2021 does not identify site TWH 002 as required for employment.

22. Under Issue 7a(2), I give consideration to representations regarding the Kent Street site. I find that concern about coalescence is justified but can be satisfactorily addressed if certain steps are taken, including deletion of site TWH 002.

23. Taking all factors into account, my conclusion is that the changed circumstances justify deletion of site TWH 002 from the proposed plan.

**Reporter’s recommendations:**

I recommend that the following modifications be made.

1. On page 81 of the proposed plan, delete the entry for site TWH 002 - Townhill Loch Car Park.

2. On the Dunfermline, Townhill, Crossford and Halbeath inset of the proposals map, delete TWH 002.
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<th>Crossgates</th>
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**Body or person(s) submitting a representation raising the issue (including reference number):**

**CROSSGATES, FORDELL & MOSSGREEN**

**Crossgates issues**

- Hendersons Surveyors (1740)
- Anne Hunter (2379)
- Andrina Alcorn (2380)
- Alison Muir (2382)
- Anita Prentice (2387)
- Alex Guthrie (2393)
- Alan Wallace (2396)
- Alastair Macmillan (2398)
- Alison Dewar (2403)
- Andrew Kerr (2410)
- Andrew Livingstone (2413)
- Angus Macdonald (2415)
- Ann Beattie (2418)
- Ann McComb (2419)
- Anna Fleming (2420)
- Annalise Johnston (2421)
- Ann Dewar (2425)
- Anne Sawers (2426)
- Anthony J Brown (2427)
- B Brown (2428)
- Barbara Connell (2429)
- Bernadette Meldrum (2430)
- Brenda Duckett (2433)
- Brian Arbury (2434)
- Brian Finch (2435)
- Brian Sawers (2436)
- Brian Williamson (2437)
- Briony Sneddon (2441)
- C Cunningham (2446)
- C W Robson (2446)
- Cameron Sneddon (2471)
- Carol Cochrane (2476)
- Catherine Brown (2478)
- Catherine W Johnston (2484)
- Charles Meldrum (2494)
- Charles Stuart (2509)
- Cheryl Brash (2510)
- Christina Gilmour (2512)
- Christine Japp (2515)

**Crossgates issues (cont)**

- S Thomson (3633)
- Michael Millington (3634)
- R Arnott (3635)
- Robert Hunter (3637)
- Robert Crichton (3651)
- Stan Tsendowski (3654)
- Ronald Brown (3655)
- Crossgates & Mossgreen Community Council (3659)
- Stephen Wilson (3660)
- S E McIntyre (3662)
- James Thomson (3664)
- G Young (3767)
- Elizabeth Law (3771)
- NHS Fife (3841)

**CRO001**

- Persimmon Homes (East Scotland) (1971)

**CRO002**

- Alexander Harkness (1078)
- Mary Y Loveday (1164)
- Michael V Loveday (1168)
- Robert B Brannan (1678)
- N & M J Philp (1689)
- Janie Forster (1727)
- Jane Hibbert (1733)
- Hilary Brannan (1737)
- Alan Forster (1749)
- David Orr (1817)
- John Wellburn (1912)
- Miller Homes East Scotland Ltd (2101)
- A Morton (2348)
- A Parker (2351)
- A Wells (2353)
- Adam Cook (2356)
- Alan Florence (2358)
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### Provision of the development plan to which the issue relates:

Settlement Plans: Crossgates, Fordell & Mossgreen and Landward

### Planning authority’s summary of the representation(s):

#### CROSSGATES, FORDELL & MOSSGREEN

#### CROSSGATES

**Crossgates Issues**

Mark McGleish (1740): Request inclusion of effective site to the south east of Crossgates at Coaledge. This site meets the test of effectiveness as set out in PAN2/2010 (CD10). This effective site can help meet the housing land requirement and bolster the effective housing land supply.

NHS FIFE (3841): Additional 174 houses under construction and potential additional 442 houses in this area could have impact on local healthcare services. It would be of benefit for discussions with NHS Fife to be arranged to confirm status of local GP and other healthcare services.

#### CRO 001: North Knowe, Inverkeithing Road

**Persimmon Homes (1971):** Number of units remaining on site is not identified. Without this information it is impossible to determine what impact this has on the LDP Housing Supply, and whether the supply is correct.

#### CRO 002: Land to the west of Old Perth Road

**David Orr (1817):** Support allocation of site CRO002 and provide additional supporting information to show that the site is effective and meets the test of effectiveness as set out in PAN2/2010 (CD10).

The agent objects to and queries some of the development requirements listed for this site.

Miller Homes East Scotland Ltd (2101): Planning merits of site CRO003 outweigh that of site CRO002 due to the following reasons:

Part of Site CRO002 is sterilized by the hazardous pipeline to the north. There will be air quality and noise issues due to proximity to the A92. There are access, topography and flooding issues and the number of units allocated to this site should be reduced to 100 – 150.

Mary Y Loveday (1164), Michael V Loveday (1168), Robert B Brannan (1678), N & M J Philp (1689), Janie Forster (1727), Jane Hibbert (1733), Hilary Brannan (1737), Alan Forster (1749), A Morton (2348), A Parker (2351), A Wells (2353), Adam Cook (2356), Alan Florence (2358), M Wells (2360), Alan Aberdien (2365), Lorna Kilcullen (2369), Avril Howe (2371), William Pryde (2684), Yvonne Moore (2707), William Prentice (2710), William Donaldson (2712), Walter Japp (2714), Thomas Temple (2881), Tracy Walker
PROPOSED FIFE LOCAL DEVELOPMENT PLAN

(2902), Theresa Laurence (2925), I Lawrence (2953), T N C Darling (2931), Karen Reb (2932), Sheila Duncan (2938), Scott Reid (2943), Joyce Darling (3023), William Cunningham (3075), Dennis Moyes (3081), Thomas MacKean (3084), Elizabeth Beattie (3076), Thomas Hunter (3094), Jane Sneddon (3102), Janice Brown (3114), Timothy McLeod (3116), Julie Law (3128), Jeanette Stuart (3136), Jessie Dewar (3139), Jessie Rigby (3141), Jeanette Smith (3143), Jean MacDonald (3145), Lyn Jarrett (3147), Jeanette Lambert (3149), M Morton (3153), Joan Black (3154), M Young (3157), Joanne Duncan (3158), Jodie Nardone (3160), Johan Crawford (3163), Margo Duncan (3165), T W E Brown (3206), William Crawford (3227), Lorraine Vaughan (3236), John Gibson (3166), John Simms (3169), John Wylie (3171), Kevin Smith (3176), Lynn Hoood (3243), M Briknall (3246), M M Leith (3249), Margaret Cook (3353), Marilyn Clough (3363), Robert Clough (3367), Pat Lovett (3415), Neil Ferry (3419), Neil Crawford (3422), M Armstrong (3424), Karen Abel (3764), Mark Duncan (3769), Anne Hunter (2379), Andrina Alcorn (2380), Alison Muir (2382), Anita Prentice (2387), Alex Guthrie (2393), Alan Wallace (2396), Alastair Macmillan (2398), Alison Dewar (2403), Andrew Kerr (2410), Andrew Livingstone (2413), Angus Macdonald (2415), Ann Beattie (2418), Ann McComb (2419), Anna Fleming (2420), Annalise Johnston (2421), Anne Sawers (2426), Anthony J Brown (2427), B Brown (2428), Barbara Connell (2429), Bernadette Meldrum (2430), Brenda Duckett (2433), Brian Arbry (2434), Brian Finch (2435), Brian Sawers (2436), Brian Williamson (2517), Briony Sneddon (2441), C Cunningham (2446), C W Robson (2464), Cameron Sneddon (2471), Carol Cochrane (2476), Catherine Brown (2478), Catherine W Johnston (2484), Charles Meldrum (2494), Charles Stuart (2509), Cheryl Brash (2510), Christina Gilmour (2512), Christina Japp (2515), Christina MacDonald (2516), Clare A Williamson (2517), Deanna McLaughan (2545), D Syme (2546), Danielle Gahan (2555), Darren Connell (2558), David Dewar (2562), David Ford (2566), David Laming (2571), David Law (2572), David Lyon (2573), David Nicoll (2574), David S Muir (2575), Ronald Selley (3471), David Stirling (2576), David W McQueen (2577), Davina Gibson (2578), Deborah Law (2579), Denise Christie (2582), Derek Duncan (2583), Derek Laurence (2584), Diane Gay (2585), Diane Howes (2586), Donald Bell (2587), Donald Graham (2588), Donald Steel (2589), Dorothy Graham (2590), Douglas L Williams (2591), E Arnott (2593), E MacDougall (2594), Elizabeth Dow (2595), Elizabeth Hodge (2596), Elizabeth Hunter (2597), Michael Law (2598), Elizabeth Lyon (2599), Elizabeth MacMillan (2600), Emma Whiteocks (2602), Florence Muir (2605), G Fleming (2609), G McIntyre (2610), Geo Hunter (2613), Geoffrey Moore (2614), George J B Fowlds (2615), George Stewart (2616), George Syme (2617), Gillian Delan (2618), Gillian Donaldson (2619), Gillian Hunter (2620), Gordon Mitchell (2625), Graham Samsel (2626), J K Westwood (2627), Harriette Moore (2592), Harvey Alcorn (2965), Hazel Kerr (2970), Helen Brown (2974), Helen Mackean (2978), Helen Steel (2983), Henry Duncan (2990), Ian Kerr (2997), Isabel Fowlds (3001), Isabel Kerr (3018), J Brash (3020), J Brown (3021), J Byrne (3022), J Gay (3026), J Knox (3046), J M Finch (3048), J Spaven (3055), J Syme (3058), Jackie McComb (3062), Jacqueline Bell (3067), Jacqueline Byrne (3074), Jacqueline McDiarmid (3085), James Allen Kilcullen (3089), James Christie (3111), James & Elizabeth Kirk (3137), Janet Main (3150), Janet Moore (3152), John R Hiscox (3189), John Rigby (3195), Samantha Daily (3199), Joyce M McQueen (3203), Jim Connell (3207), June Armstrong (3215), K Russell (3218), K Sutherland (3230), Kara Westwood (3235), John Moffat (3183), Karen Japp (3238), Keith Cochrane (3239), Kevin Vaughan (3259), I M McArthur (3266), Les Howes (3271), Liam Morton (3278), Richard and Margaret Bray (3295), Raymond Young (3297), Lorna Guthrie (3315), Lillias M Hiscox (3326), M Wylie (3345), Margaret Brown (3348), Suzie Paton (3356), Sharon Wallace (3373), Mark Wallace (3384), May Downie (3393), L Parker (3398), Stella Stevens (3402), Peter Williamson (3614), P Russell (3411), Marion Crichton (3414), Pat Lovett (3421), J Baillie
PROPOSED FIFE LOCAL DEVELOPMENT PLAN

In response to site CRO002 specifically object to proximity to hazardous pipeline, parking problems and local roads are not suitable to take traffic generated by development here

CRO 003: Gallows Knowe

The Woodland Trust Scotland (2876): 10m buffer should be proposed between development site and adjacent ancient woodland.

SEPA (3361): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken.

Miller Homes East Scotland Ltd (2107): Support allocation of site CRO003 and provide additional supporting information to show that the site is effective and meets the test of effectiveness as set out in PAN2/2010 (CD10).

Mary Y Loveday (1165), Michael V Loveday (1169), Robert B Brannan (1682), N & M J Philp (1690), Janie Forster (1728), Jane Hibbert (1736), Hilary Brannan (1738), Alan Forster (1750), A Morton (2349), A Parker (2352), A Wells (2354), Adam Cook (2357), Alan Florence (2359), M Wells (2361), Alan Aberdien (2366), Lorna Kilcullen (2370), Avril Howe (2372), William Pryde (2686), Yvonne Moore (2709), William Prentice (2711), William Donaldson (2713), Walter Japp (2715), Thomas Temple (2888), Tracy Walker (2907), Theresa Laurence (2927), I Lawrence (2954), T N C Darling (2934), Sheila Duncan (2939), Scott Reid (2944), William Cunningham (3077), Dennis Moyes (3083), Thomas MacKean (3092), Elizabeth Beattie (3090), Thomas Hunter (3099), Jane Sneddon (3106), Janice Brown (3113), Timothy McLeod (3120), Julie Law (3132), Jeanette Stuart (3138), Jessie Dewar (3140), Jessie Rigby (3142), Jeanette Smith (3144), Jean MacDonald (3146), Lyn Jarret (3148), Jeanette Lambert (3151), M Morton (3155), Joan Black (3156), M Young (3162), Joanne Duncan (3159), Jodie Nardone (3161), Johan Crawford (3164), Margo Duncan (3167), T W E Brown (3208), Lorraine Vaughan (3237), John Gibson (3168), John Simms (3170), John Wylie (3172), Kevin Smith (3177), William Crawford (3250), Lynn Hood (3244), M Brieknall (3247), M M Leith
Wilson (3660), S E McIntyre (3662), James Thomson (3664), Ann Dewar (2425), G Young (3767), Karen Abel (3765), Mark Duncan (3770), Elizabeth Law (3771), Joseph Kenny (3829), Robert Anderson (89), John Wellburn (1931): Object to sites CRO002 and CRO003 on grounds of overdevelopment, traffic congestion, substantial mine workings on both sites and lack of infrastructure. School, nursery and GP surgery are already at capacity. Affordable housing percentage is too low for Crossgates.

In response to site CRO003 specifically object to development due to the impact it will have on the community woodland, flooding at the Mowbary Burn and traffic problems. This area is a natural habitat for wildlife and potentially protected European species (bats). A full wildlife impact assessment would be required to establish the potential disruption to this area in terms of wildlife. Public path already provides existing defensible boundary. Loss of open field will have a detrimental effect on the quality of life in the area.

CRO 005: Manse Road

SEPA (3346): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken and for a buffer strip along the watercourse.

COUNTRYSIDE AREA

LWD 019: Halbeath Triangle North East

SEPA (3566): Support the inclusion within the Development Requirements for a buffer strip along the watercourse.

LWD 030 Land at Halbeath

SEPA (3268): Request an expansion of the developer requirements to specify the need for a flood risk assessment and ensure that no built development takes place on the functional flood plain (or within an area of known flood risk) will help promote a sustainable approach to managing flood risk.

**Modifications sought by those submitting representations:**

CROSSGATES, FORDELL & MOSSGREEN

CROSSGATES

Crossgates Issues

Mark McGleish (1740): Request inclusion of site

CRO 002: Land to the west of Old Perth Road

David Orr (1817): Request the following changes to the Development Requirements:

- Suggest deletion of: “Separation/attenuation is required between the housing adjacent to the motorway slip to safeguard residential amenity”
- Suggest an amendment to improve clarity. The amendment would be:
“Development requires to take account of the middle consultation zone associated with the pipeline located to the north of the site”
- Noted that “Develop a robust, high quality landscape edge with the road to address potential issues arising from proximity to the A92. Integrate the existing mature vegetation” is listed twice in the Site Requirements in the Proposed LDP and therefore our clients object and request that one of the two instances of this site requirement be deleted from the adopted Local Development Plan.
- Suggest a minor wording amendment so that after off-site contribution “, at the planning application stage,” is inserted; and “the” after including is also deleted.

Miller Homes East Scotland Ltd (2101): Objector wishes that the number of units allocated to this site be reduced to 100 – 150.

COUNTRYSIDE AREA

LWD 030 Land at Halbeath

SEPA (3268): Request an expansion of the developer requirements to specify the need for a flood risk assessment and ensure that no built development takes place on the functional flood plain (or within an area of known flood risk) will help promote a sustainable approach to managing flood risk.

Summary of responses (including reasons) by planning authority:

CROSSGATES, FORDELL & MOSSGREEN

CROSSGATES

Crossgates Issues

Mark McGleish (1740): The Proposed Local Development Plan allocates land for housing across the Dunfermline & West Fife Housing Market Area, sufficient to meet statutory requirements.

Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with under the Homes Schedule 4 (2B) and its associated supporting paper. Crossgates area is outwith the strategic development areas identified in SESplan (CD2). The scale of new housing allocations in the area should therefore represent more local scale development to meet local needs. The adopted Local Plan already identifies a number of housing sites of varying sizes in the area. These have been augmented by two additional sites in Crossgates (ref CRO 001 & CRO 002). It is considered that these allocations meet the local requirement at the present time and provide a good range of locations and site sizes within the area. At this time, there is no need to allocate, for housing, any of the sites which are the subject of these representations. The site at Cuttlehill is in the countryside with no services in the immediate vicinity and there are more suitable sites available within Crossgates.

NHS FIFE (3841): Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been
planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision.

CRO 001: North Knowe, Inverkeithing Road

Persimmon Homes (1971): the 2014 Housing Land Audit provides the up to date position with regards the phasing of housing numbers, the number of completed houses on this site and how many units are remaining.

CRO 002: Land to the west of Old Perth Road

David Orr (1817): Fife Council acknowledge the supporting information to show that the site is effective and meets the test of effectiveness as set out in PAN2/2010 (CD10). Comments on the Development requirements are noted and Fife Council considers that there is merit in the following changes

Delete one of the bullet points that state “Develop a robust, high quality landscape edge with the road to address potential residential amenity issues arising from proximity to the A92. Integrate the existing mature vegetation”

A minor wording amendment so that after off-site contribution “, at the planning application stage,” is inserted; and “the” after including is also deleted and invites the Reporter to make an appropriate recommendation on this issue.

Miller Homes East Scotland Ltd (2101): This site meets the tests of effectiveness as set out in Planning Advice Note 2/2010 Affordable Housing and Housing Land Audits (CD10). The final numbers attributed to this site will come through the planning application process as will the layout and final design of the site.

Mary Y Loveday (1164), Michael V Loveday (1168), Robert B Brannan (1678), N & M J Philp (1689), Janie Forster (1727), Jane Hibbert (1733), Hilary Brannan (1737), Alan Forster (1749), A Morton (2348), A Parker (2351), A Wells (2353), Adam Cook (2356), Alan Florence (2358), M Wells (2360), Alan Aberdien (2365), Lorna Kilcullen (2369), Avril Howe (2371), William Pryde (2684), Yvonne Moore (2707), William Prentice (2710), William Donaldson (2712), Walter Japp (2714), Thomas Temple (2881), Tracy Walker (2902), Theresa Laurence (2925), I Lawrence (2953), T N C Darling (2931), Karen Reb (2932), Sheila Duncan (2938), Scott Reid (2943), Joyce Darling (3023), William Cunningham (3075), Dennis Moyes (3081), Thomas MacKean (3084), Elizabeth Beattie (3076), Thomas Hunter (3094), Jane Sneddon (3102), Janice Brown (3114), Timothy McLeod (3116), Julie Law (3128), Jeanette Stuart (3136), Jessie Dewar (3139), Jessie Rigby (3141), Jeanette Smith (3143), Jean MacDonald (3145), Lyn Jarrett (3147), Jeanette Lambert (3149), M Morton (3153), Joan Black (3154), M Young (3157), Joanne Duncan (3158), Jodie Nardone (3160), Johan Crawford (3163), Margo Duncan (3165), T W E Brown (3206), William Crawford (3227), Lorraine Vaughan (3236), John Gibson (3166), John Simms (3169), John Wylie (3171), Kevin Smith (3176), Lynn Hood (3243), M Briknall (3246), M M Leith (3249), Margaret Cook (3353), Marilyn Clough (3363), Robert Clough (3367), Pat Lovett (3415), Neil Ferry (3419), Neil Crawford (3422), M Armstrong (3424), Karen Abel (3764), Mark Duncan (3769), Anne Hunter (2379), Andrina Alcorn (2380), Alison Muir (2382), Anita Prentice (2387), Alex Guthrie (2393), Alan Wallace (2396), Alastair Macmillan (2398), Alison Dewar (2403), Andrew Kerr (2410), Andrew Livingstone (2413), Angus Macdonald (2415), Ann Beattie (2418), Ann Mccomb (2419), Anna Fleming (2420), Annalise Johnston (2421), Anne Sawers (2426),
Anthony James Brown (2427), B Brown (2428), Barbara Connell (2429), Bernadette Meldrum (2430), Brenda Duckett (2433), Brian Arbury (2434), Brian Finch (2435), Brian Sawers (2436), Brian Williamson (2437), Briony Sneddon (2441), C Cunningham (2446), C W Robson (2464), Cameron Sneddon (2471), Carol Cochrane (2476), Catherine Brown (2478), Catherine W Johnston (2484), Charles Meldrum (2494), Charles Stuart (2509), Cheryl Brash (2510), Christina Gilmour (2512), Christina Japp (2515), Christina MacDonald (2516), Clare A Williamson (2517), Deanna McLaughan (2545), D Syme (2546), Danielle Gahan (2555), Darren Connell (2558), David Dewar (2562), David Ford (2566), David Laming (2571), David Law (2572), David Lyon (2573), David Nicoll (2574), David S Muir (2575), Ronald Selley (3471), David Stirling (2576), David W McQueen (2577), Davina Gibson (2578), Deborah Law (2579), Denise Dair (2580), Dennis Christie (2582), Derek Duncan (2583), Derek Laurence (2584), Diane Gay (2585), Diane Howes (2586), Donald Bell (2587), Donald Graham (2588), Donald Steel (2589), Dorothy Graham (2590), Douglas L Williamson (2591), E Arnott (2593), E MacDougall (2594), Elizabeth Dow (2595), Elizabeth Hodge (2596), Elizabeth Hunter (2597), Michael Law (2598), Elizabeth Lyon (2599), Elizabeth MacMillan (2600), Emma Whitelocks (2602), Florence Muir (2605), G Fleming (2609), G McIntyre (2610), Geo Hunter (2613), Geoffrey Moore (2614), George J B Fowlds (2615), George Stewart (2616), George Syme (2617), Gillian Delan (2618), Gillian Donaldson (2619), Gillian Hunter (2620), Gordon Mitchell (2625), Graham Samsel (2626), J K Westwood (2627), Harriet Moore (2692), Harvey Alcorn (2965), Hazel Kerr (2970), Helen Brown (2974), Helen Mackean (2978), Helen Steel (2983), Henry Duncan (2990), Ian Kerr (2997), Isobel Fowlds (3001), Isobel Kerr (3018), J Brash (3020), J Brown (3021), J Byrne (3022), J Gay (3026), J Knox (3046), J M Finch (3048), J Spaven (3055), J Syme (3058), Jacqueline Mccomb (3062), Jacqueline Bell (3067), Jacqueline Byrne (3074), Jacqueline McNaird (3085), James A Kilcullen (3089), James Christie (3111), James & Elizabeth Kirk (3137), Janet Main (3150), Janet Moore (3152), John R Hiscox (3189), John Rigby (3195), Samantha Daily (3199), Joyce M McQueen (3203), Jim Connell (3207), June Armstrong (3215), K Russell (3218), K Sutherland (3230), Kara Westwood (3235), John Moffat (3183), Karen Japp (3238), Keith Cochrane (3239), Kevin Vaughan (3259), L M McArthur (3266), Les Howes (3271), Liam Morton (3278), Richard and Margaret Bray (3295), Raymond Young (3297), Lorna Guthrie (3315), Lillias M Hiscox (3326), M Wylie (3345), Margaret Brown (3348), Suzie Paton (3356), Sharon Wallace (3373), Mark Wallace (3384), May Downie (3393), L Parker (3398), Stelia Stevens (3402), Peter Williamson (3614), P Russell (3411), Marion Crichton (3414), Pat Lovett (3421), J Baillie (3416), Margaret Moffat (3418), Margaret Williamson (3439), Mary Pryde (3442), Mary Christie (3448), D Baillie (3447), Sandra Selley (3450), Mary Hunter (3449), Mike Smith (3453), Minto Stewart (3462), Mary R Fotheringham (3465), Maxine Bignell (3468), Pauline Duncan (3479), Megan Duncan (3480), Robert Sneddon (3495), Rachel Walker (3508), William Pentrice (3512), Margaret Laming (3515), M Raymond Lovett (3516), P Byrne (3517), Ian McDonald (3521), G Craige (3534), Mark Campbell (3540), Sheila Beveridge (3541), R P Duncan (3547), Ruth Smith (3551), R Robson (3552), Raymond Law (3555), Robert Waddell (3561), Margaret Simms (3585), R A Kenny (3608), Roslyne Dewar (3618), Paul Bignell (3620), Paul Laidlaw (3623), Senga Temple (3625), R McArthur (3626), R Jarrett (3624), S Thomson (3633), Robert Hunter (3637), Michael Millington (3634), R Arnott (3635), Robert Crichton (3651), Stan Tsendowski (3654), Ronald Brown (3655), Stephen Wilson (3660), S E McIntyre (3662), James Thomson (3664), Ann Dewar (2425), G Young (3767), Karen Abel (3764), Mark Duncan (3769), Elizabeth Law (3771), Joseph Kenny (3828), John Wellburn (1912), Alexander Harkness (1078): Fife Council has a statutory duty to ensure that the FIFEplan Local Development Plan (LDP) (CD5) conforms to the SESEP plan Strategic Development Plan (CD2) before it can be adopted. The Council must maintain at least a
5 year effective housing land supply in the Dunfermline and West Fife Housing Market Area, and the Local Development Plan should identify sufficient sites to meet the housing land requirement for 10 years as detailed in the SESplan Strategic Development Plan (CD2). Crossgates is a settlement outwith the Strategic Development Area which could accommodate large or medium scale development. This site fits in with the existing character, scale and form of Crossgates. This site has defensible boundaries on all side and integrates well with the existing settlement. The site is within close proximity to all local services in Crossgates. Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the LDP process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision. Detailed matters, such as the specifications of road access and drainage arrangements, ground conditions and proximity to the hazardous pipeline for example, will be dealt with at planning application stage.

CRO 003: Gallows Knowe

The Woodland Trust Scotland (2876): No development within 10m of the Cuttlehill wildlife site and adjacent woodland and wetland habitat is already stated within the Development Requirements for this site.

SEPA (3361): Support noted

Miller Homes East Scotland Ltd (2107): Fife Council acknowledges the supporting information to show that the site is effective and meets the test of effectiveness as set out in PAN2/2010 (CD10).

Mary Y Loveday (1165), Michael V Loveday (1169), Robert B Brannan (1682), N & M J Philp (1690), Janie Forster (1728), Jane Hibbert (1736), Hilary Brannan (1738), Alan Forster (1750), A Morton (2349), A Parker (2352), A Wells (2354), Adam Cook (2357), Alan Florence (2359), M Wells (2361), Alan Aberdien (2366), Lorna Kilcullen (2370), Avril Howe (2372), William Pryde (2686), Yvonne Moore (2709), William Prentice (2711), William Donaldson (2713), Walter Japp (2715), Thomas Temple (2888), Tracy Walker (2907), Theresa Laurence (2927), I Lawrence (2954), T N C Darling (2934), Sheila Duncan (2939), Scott Reid (2944), William Cunningham (3077), Dennis Moyes (3083), Thomas MacKean (3092), Elizabeth Beattie (3090), Thomas Hunter (3099), Jane Sneddon (3106), Janice Brown (3113), Timothy McLeod (3120), Julie Law (3132), Jeanette Stuart (3138), Jessie Dewar (3140), Jessie Rigby (3142), Jeanette Smith (3144), Jean MacDonald (3146), Lyn Jarret (3148), Jeanette Lambert (3151), M Morton (3155), Joan Black (3156), M Young (3162), Joanne Duncan (3159), Jodie Nardone (3161), Johan Crawford (3164), Margo Duncan (3167), T W E Brown (3208), Lorraine Vaughan (3237), John Gibson (3168), John Simms (3170), John Wylie (3172), Kevin Smith (3177), William Crawford (3250), Lynn Hood (3244), M Brieknall (3247), M M Leith (3248), Pat Lovett (3417), Neil Ferry (3420), Neil Crawford (3423), M Armstrong (3425), Alexander Harkness (1956), Anne Hunter (2379), Andrina Alcorn (2380), Alison Muir (2382), Anita Prentice (2387), Alex Guthrie (2393), Alan Wallace (2396), Alastair Macmillan (2398), Alison Dewar (2403), Andrew Kerr (2410), Andrew Livingstone (2413), Angus Macdonald (2415), Ann Beattie (2418), Ann Mccomb (2419), Anna Fleming (2420), Annalise Johnston (2421), Anne Sawers (2426), Anthony J Brown (2427), B Brown (2428), Barbara Connell (2429), Bernadette Meldrum (2430), Brenda
Duckett (2433), Brian Arbury (2434), Brian Finch (2435), Brian Sawers (2436), Brian Williamson (2437), Briony Sneddon (2441), C Cunningham (2446), C W Robson (2464), Cameron Sneddon (2471), Carol Cochrane (2476), Catherine Brown (2478), Catherine W Johnston (2484), Charles Meldrum (2494), Charles Stuart (2509), Cheryl Brash (2510), Christina Gilmour (2512), Christina Japp (2515), Christina MacDonald (2516), Clare A Williamson (2517), Deanna McLaughan (2545), D Syme (2546), Danielle Gahan (2555), Darren Connell (2558), David Dewar (2562), David Ford (2566), David Laming (2571), David Law (2572), David Lyon (2573), David Nicoll (2574), David S Muir (2575), Ronald Selley (3471), David Stirling (2576), David W McQueen (2577), Davina Gibson (2578), Deborah Law (2579), Denise Dair (2580), Dennis Christie (2582), Derek Duncan (2583), Derek Laurence (2584), Diane Gay (2585), Diane Howes (2586), Donald Bell (2587), Donald Graham (2588), Donald Steel (2589), Dorothy Graham (2590), Douglas L Williamson (2591), E Arnott (2593), E MacDougall (2594), Elizabeth Dow (2595), Elizabeth Hodge (2596), Elizabeth Hunter (2597), Michael Law (2598), Elizabeth Lyon (2599), Elizabeth MacMillan (2600), Emma Whitelocks (2602), Florence Muir (2605), G Fleming (2609), G McIntyre (2610), Geo Hunter (2613), Geoffrey Moore (2614), George J B Fowlds (2615), George Stewart (2616), George Syme (2617), Gillian Delan (2618), Gillian Donaldson (2619), Gillian Hunter (2620), Gordon Mitchell (2625), Graham Samsel (2626), J K Westwood (2627), Harriet Moore (2692), Harvey Alcorn (2965), Hazel Kerr (2970), Helen Brown (2974), Helen Mackean (2978), Helen Steel (2983), Henry Duncan (2990), Ian Kerr (2997), Isobel Fowlds (3001), Isobel Kerr (3018), J Brash (3020), J Brown (3021), J Byrne (3022), J Gay (3026), J Knox (3046), J M Finch (3048), J Spaven (3055), J Syme (3058), Jackie Mccomb (3062), Jacqueline Bell (3067), Jacqueline Byrne (3074), Jacqueline McDiarmid (3085), James A Kilcullen (3089), James Christie (3111), James & Elizabeth Kirk (3137), Janet Main (3150), Janet Moore (3152), John R Hiscox (3189), John Rigby (3195), Samantha Daily (3199), Joyce M McQueen (3203), Jim Connell (3207), June Armstrong (3215), K Russell (3218), K Sutherland (3230), Kara Westwood (3235), John Moffat (3183), Karen Japp (3238), Keith Cochrane (3239), Kevin Vaughan (3259), L M McArthur (3266), Les Howes (3271), Liam Morton (3278), Richard and Margaret Bray (3295), Raymond Young (3297), Lorna Guthrie (3315), Lillas M Hiscox (3326), M Wylie (3345), Margaret Brown (3348), Suzie Paton (3356), Sharon Wallace (3373), Mark Wallace (3384), May Downie (3393), L Parker (3398), Stelia Stevens (3402), Peter Williamson (3614), P Russell (3411), Marion Crichton (3414), Pat Lovett (3421), J Baillie (3416), Margaret Moffat (3418), Margaret Williamson (3439), Mary Pryde (3442), Mary Christie (3448), D Baillie (3447), Sandra Selley (3450), Mary Hunter (3449), Mike Smith (3453), Minto Stewart (3462), Mary R Fotheringham (3465), Maxine Bignell (3468), Pauline Duncan (3479), Megan Duncan (3480), Robert Sneddon (3495), Rachel Walker (3508), William Pentrice (3512), Margaret Laming (3515), M Raymond Lovett (3516), P Byrne (3517), lan McDonald (3521), G Craige (3534), Mark Campbell (3540), Sheila Beveridge (3541), R P Duncan (3547), Ruth Smith (3551), R Robson (3552), Raymond Law (3555), Robert Waddell (3561), Margaret Simms (3585), R A Kenny (3608), Roslyne Dewar (3618), Paul Bignell (3620), Paul Laidlaw (3623), Senga Temple (3625), R McArthur (3626), R Jarrett (3624), S Thomson (3633), Robert Hunter (3637), Michael Millington (3634), R Arnott (3635), Robert Crichton (3651), Stan Tsendowski (3654), Ronald Brown (3655), Stephen Wilson (3660), S E McIntyre (3662), James Thomson (3664), Ann Dewar (2425), G Young (3767), Karen Abel (3765), Mark Duncan (3770), Elizabeth Law (3771), Joseph Kenny (3829), Robert Anderson (89), John Wellburn (1931): Fife Council has a statutory duty to ensure that the FIFEplan Local Development Plan (LDP) (CD5) conforms to the SESplan Strategic Development Plan (CD2) before it can be adopted. The Council must maintain at least a 5 year effective housing land supply in the Dunfermline and West Fife Housing Market Area, and the Local Development Plan should identify sufficient sites to
meet the housing land requirement for 10 years as detailed in the SESplan Strategic Development Plan (CD2). Crossgates is a settlement outwith the Strategic Development Area which could accommodate large or medium scale development. Site supported. Two points of access can be achieved. The Development Requirements for this site set out what is required such as high quality design to mitigate Landscape and integration concerns and also the need for a Flood Risk Assessment. Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision. Detailed matters, such as the specifications of road access and drainage arrangements and impact on wildlife, will be dealt with at planning application stage.

COUNTRYSIDE AREA

LWD 019: Halbeath Triangle North East

SEPA (3566): Support noted

LWD 030 Land at Halbeath

SEPA (3268): Comments noted. Fife Council considers that there is merit to add the request for an expansion of the developer requirements to specify the need for a flood risk assessment and ensure that no built development takes place on the functional flood plain (or within an area of known flood risk) will help promote a sustainable approach to managing flood risk and invites the Reporter to make an appropriate recommendation on this issue.

Reporter's conclusions:

Crossgates - land at Cuttlehill (Coaledge)

1. From my inspection, I note that Fordell-Coaledge-Mossgreen is a small hamlet. It consists of residential properties and a tavern. The west end of the Cuttlehill site adjoins a short section of the boundary of the settlement envelope that encloses the hamlet. From here, the site extends eastwards. It is defined on its north side by the B925 (Kirkcaldy Road) and on its south side by an abandoned section of road now largely overgrown and used as a footpath. The north side of the site is lined by roadside trees. In the eastern extremity of the site is a small wood.

2. I find that, in landscape terms, housing development on the Cuttlehill site would be poorly related to the adjoining hamlet. It would be largely surrounded by open countryside. Any relationship to the built-up area of the hamlet would be tenuous. This finding is not altered by the housing development that is now taking place on the Gallows Knowe site. The latter site is on the north side of the B925 and is further to the west than the Cuttlehill site.

3. Neither the representation nor the council’s response demonstrates that a structured environmental assessment process has been undertaken with regard to the proposal.
that the Cuttlehill site be used for residential development. I have no evidence of public engagement.

4. Circular 6/2013: Development Planning, at paragraph 118, says: “Reporters require adequate environmental information to be provided to them, together with evidence arising from public engagement, without this they will be unable to recommend modifications to the plan on particular sites.” In the present instance, I find that I do not have this information and evidence.

5. The representation says that the proposed development would help meet the housing land requirement. I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the five-year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under Issue 2(b) Homes with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that this site would nevertheless be unacceptable because development would not be satisfactory in terms of landscape and evidence does not demonstrate adequate environmental assessment and public engagement. These deficiencies outweigh the benefits of addressing any shortfall. The argument with regard to site effectiveness does not change my view.

6. My conclusion is that the proposed plan need not be altered.

**Crossgates - healthcare services**

7. Discussions with NHS Fife regarding possible impact on healthcare services would no doubt be beneficial. However, such discussions can take place irrespective of whether they are mentioned in the plan. My conclusion is that the proposed plan need not be altered.

**Crossgates - North Knowe, Inverkeithing Road, site CRO 001**

8. The proposed plan gives an estimate of the number of dwellings for which the site has capacity. This number is not disputed. Regarding the number of dwellings still to be constructed, this is information that is contained in the annual housing land audits. My conclusion is that the proposed plan need not be altered.

**Crossgates - land to the west of Old Perth Road, site CRO 002**

9. Concerns raised in representations regarding site CRO 002 are grouped under the following headings.

**Landscape and urban sprawl**

10. From my inspection, I note that, on its south and east sides, site CRO 002 adjoins the existing built-up area. On the remaining side, the site adjoins the A92 and is bounded by trees. The resultant settlement boundary would be defensible. It would not encourage any further extension of the village in a north-westerly direction. I find that development on the site would not amount to urban sprawl and would not encourage urban sprawl.

11. My attention has not been drawn to any viewpoints from which development on site CRO 002 would be seen as damaging the setting of Crossgates. During my inspection, I
noted that the site was enclosed by the adjacent built-up area and by trees. I find that development on the site would not have an unacceptable effect on the landscape setting and identity of the village.

12. The open outlook from houses adjoining the site would be significantly affected by development on the site. This is an effect that commonly occurs with expansion of any built-up area. In the present case, there is nothing to demonstrate that this effect would necessarily be unacceptable.

Access

13. The site assessment says that a transport assessment must be provided. At least two points of vehicular and pedestrian access are required - one from Main Street and one from Manse Road. The proposed plan confirms that two points of access are required.

14. During my site inspection, I noted that there were parked cars along Manse Road. Traffic flow was very light. The parked cars were not impeding the movement of traffic up and down Manse Road.

15. The chief adverse effect of parked cars that I observed was at the junction of Manse Road and Main Street, where vehicles parked on Main Street close to the junction meant that vehicles emerging from Manse Road had restricted visibility of oncoming traffic. I also noted that any vehicle parked in Manse Road close to the junction would adversely affect turning movements into and out of Manse Road. I find that all of these matters appear capable of being addressed by straightforward traffic management measures.

16. There appears to be no concern regarding access direct from the site to Main Street. It may be that residential development on site CRO 002 could be designed in such a way as to encourage use of the Main Street access by most of the traffic going to and from the site.

17. Taking account of all the foregoing considerations, I find that development on site CRO 002 is capable of being served by satisfactory access arrangements.

Infrastructure

18. Regarding availability of school places, this is reviewed in the site assessment and is not identified as an insuperable problem. Policy 4 of the proposed plan provides a basis for seeking developer contributions to the cost of any necessary increase in school capacity.

19. Lack of capacity in local surgeries appears to be a common concern and does not differentiate site CRO 002 from housing sites in other communities in the local development plan area.

Pipeline

20. I note from the spatial analysis information that very approximately two-thirds of the site (nearest to the A92) are within hazard pipeline consultation zones. The proposed plan, under CRO 002, says that development “requires to take account of the presence
of a safeguarded hazard pipeline route”. One of the representors says that the existence of the pipeline is “potentially sterilizing a sizeable area of land for development”. The council’s response is that this is a detailed matter that will be dealt with at the planning application stage.

21. I find that the possibility that development on two-thirds of the site might be subject to restriction is more than a detailed matter. A serious restriction on housing development in this part of the site could reduce the capacity of the site from 260 dwellings (the estimate given in the proposed plan) to 100 dwellings or less. This would be a significant reduction.

22. My conclusion is that consideration needs to be given to reducing the estimated capacity of the site.

Topography

23. Concern is expressed that topography is a further potential constraint. During my inspection, I noted that parts of the site do have noticeably steep gradients.

Trunk road A92

24. Proximity of the site to the A92 is also a concern. Traffic on the road is said to cause noise and air pollution. In the proposed plan, text under site CRO 002 says that “Separation/attenuation is required between the housing adjacent to the motorway slip to safeguard residential amenity”. One of the green network priorities for the site is to “Develop a robust, high quality landscape edge with the road to address potential issues arising from proximity to the A92”.

25. When I inspected the site and its surroundings, I found that noise from traffic on the A92 was audible at all times and that this is a real issue rather than a potential issue. From my experience in other situations, I understand that transmission of sound is reduced most effectively by a solid barrier of some kind, rather than by tree and shrub planting.

26. The undulating nature of site CRO 002 provides some solid screening beside the A92, but this screening is not continuous. Low points between undulations give a direct line of sight between traffic on the A92 and parts of the site. This may well be letting more sound invade the site than would be the case if there were no such features.

27. How best to reduce noise - both external and within buildings - requires specialist acoustic advice.

28. Taking account of the preceding considerations, my conclusion is that the development requirements under site CRO 002 should include need to obtain a report from an acoustic engineer. The report should advise on how best to reduce external noise from the A92 and advise whether house design should incorporate special measures to reduce the transmission of external noise to the interior of the proposed houses.

29. Regarding air pollution, while all traffic causes pollution, submissions do not demonstrate that the level of pollution in the vicinity of the A92 is such that there should be no development on site CRO 002.
30. It is contended that the proposed allocation of 260 units is excessive as it is based on the gross developable area and not on a much less extensive net developable area, taking into account various constraints. “The site might only be able to accommodate a smaller number of units, such as 100 - 150”. The council’s response is that the final number will come through the planning application process.

31. I note that the total site area is given as 8.7 hectares and that the estimated capacity is based on development of this whole area at a density of 30 dwellings per hectare.

32. In relation to concern about the pipeline, I concluded that consideration needs to be given to reducing the estimated capacity of the site. Regarding topography, I noted that parts of the site - generally parts that are nearest to the pipeline - do have noticeably steep gradients. Regarding noise, the report that should be prepared by an acoustic engineer may advise, for example, that there be some earth mounding with landscaping within parts of the site adjacent to the A92. This may take up land that would otherwise have been available for development. The acoustic report might also advise that development should not be too close to the A92. All of these points lead me to the conclusion that the estimated capacity in the proposed plan is too high. On the other hand, evidence does not demonstrate that the pipeline consultation zone is equivalent to a “no development” zone and that flood risk and access considerations are likely to reduce capacity. I therefore do not accept that capacity should be as low as 100 to 150 units. Instead, I consider 200 to be a more realistic figure.

33. Regarding concern about development on agricultural land, I note that site CRO 002 is not prime quality land. I find that loss of some agricultural land is unavoidable if the housing land supply required by SESplan is to be provided.

34. I note that there may be old mine workings beneath the site. This does not necessarily prevent development. The normal planning application process should identify whether there is any risk of subsidence and, if there is, what measures would be needed to address the risk.

35. Regarding the concern that the proportion of affordable houses would be too low, the requirement for affordable houses is contained in Policy 2: Homes. This policy is given consideration under issue 2(b).

36. It is contended that the lower southern and western parts of the site have the potential to flood unless surface water can be adequately attenuated and treated. It is claimed that there appears to be no watercourse to which surface water could discharge and that there could be a severe impact on the extent of developable area by provision for attenuation and storage of surface water.
37. I note that in the site assessment the Scottish Environment Protection Agency’s comments on flood risk say “The National Pluvial Map indicates that the southern and eastern areas of the site are potentially vulnerable to pluvial flooding.” I also note that there is no recommendation that a flood risk assessment be undertaken.

38. From my inspection, I note that the lowest part of the site is at its western extremity. At this point, there is a concrete structure with a metal grill which appears to function as a sump at the entrance to a culvert beneath the A92. The Mowbray Burn (dry at the time of my inspection) leads to this point. The site is generally at a significantly higher level than the sump.

39. In view of the potential vulnerability to pluvial flooding, I find that a flood risk assessment should be carried out. Thereafter, design of development for the site should take into account the findings of the flood risk assessment. From the evidence and from what I observed during my site inspection, I find that it has not been demonstrated that flood risk is likely to reduce the number of dwellings that might be erected on the site.

Landowner concerns

40. In the proposed plan, under site CRO 002, duplication of the first green network priority is clearly a typographical mistake which should be corrected. Correction is embraced in the following paragraphs.

41. It is contended that the development requirement that begins “Separation/attenuation …..” should be deleted because it duplicates the first green network priority. I find that this development requirement is not satisfactory for the following reasons: the amount of separation is not specified; there is no reference to the amenity buffer notation shown on the proposals map; the amenity buffer appears somewhat narrow and may not be wide enough to accommodate measures that might be recommended in the acoustic engineer’s report; what is to be attenuated is not specified; and there is need to protect development from traffic passing the whole of the north-western side of the site, not just that part adjoining the slip road.

42. Although it is not clear, I presume that the “attenuation” is intended to refer to traffic noise from the A92. This issue would be addressed by the acoustic report to which I refer above.

43. The “separation” aspect can be adequately addressed by the first green network priority. As already indicated, I find that the amenity buffer may not be of sufficient width. For this reason, the first green network priority should include text that says that the amenity buffer shown on the proposals map is indicative and that a wider buffer may be required to ensure an adequate standard of residential amenity. The first green network priority, as amended, should be moved from the green network priorities and be made a development requirement to reflect the importance of the issues involved.

44. Amendment of the wording of the hazard pipeline development requirement is sought. The point is made that the pipeline is to the north of the site. I find that the wording contained in the proposed plan might give the impression that the pipeline traverses the site. Sufficient clarity would be provided by inserting text to say that the pipeline is to the north of the site.

45. Amendment to the wording of the last green network priority is sought. I agree that
slight amendments to the text would improve clarity and that the proposed plan should be altered accordingly.

Crossgates - Gallows Knowe, site CRO 003

46. Information provided by the council indicates that planning permission for housing development on the Gallows Knowe site was granted on 28 December 2015. During a subsequent site inspection, I noted that construction work was well underway. I have noted the representations that have been made, but in view of the circumstances, I do not recommend any alteration to the proposed plan.

Crossgates - Land at Halbeath, site LWD 030

47. Scottish Planning Policy (paragraph 256) says that the planning system should prevent development which would have a significant probability of being affected by flooding or which would increase the probability of flooding elsewhere. Reduction of functional floodplains should be avoided. Development on the proposed allocation site must conform to these requirements. To ensure this, I agree with the Scottish Environment Protection Agency that a flood risk assessment should be carried out. Thereafter, design of development for the site should take into account the findings of the flood risk assessment.

Reporter’s recommendations:

I recommend that the following modifications be made:

1. On page 54 of the proposed plan, the estimated capacity for site CRO 002 (Land to the west of Old Perth Road) should be altered to read 200.

2. On page 54 of the proposed plan, in the development requirements for site CRO 002 (Land to the west of Old Perth Road), make the following changes.

   (a) Delete the paragraph that begins “Separation/attenuation …..”

   (b) Insert the following three new paragraphs.

   “An acoustic engineer must be appointed to report on how best to reduce external noise from the A92 and to report on whether house design should incorporate special measures to reduce the transmission of external noise to the interior of the proposed houses. The design of development must take account of the findings of the report.”

   “Provide a robust, high-quality landscape edge along that side of the site that adjoins the A92. The amenity buffer shown on the proposals map is indicative. A wider buffer may be required to ensure an adequate standard of residential amenity.”

   “A flood risk assessment is required. Design of development must take account of the findings of the flood risk assessment.”

   (c) In the paragraph that begins “Development requires …..”, after “route” insert “to
3. On page 54 of the proposed plan, in the green network priorities for site CRO 002 (Land to the west of Old Perth Road), make the following changes.

   (a) Delete the two paragraphs that begin “Develop a robust …...”
   (b) In the paragraph that begins “Consider the appropriateness …...”, after “contribution” insert “at the planning application stage” and after “including” delete “the”.

4. On page 188 of the proposed plan, in the text for site LWD 030, Land at Halbeath, insert after “drainage issues” the following:

   “A flood risk assessment is required. Design of development must take account of the findings of the flood risk assessment.”
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Body or person(s) submitting a representation raising the issue (including reference number):

**ABERDOUR**

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### Proposed Fife Local Development Plan

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- David Mallon (2947)
- James Bell (3096)
- SEPA (3302)
- Roy Marrian (3862)

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#### Provision of the Development Plan to Which the Issue Relates:

Settlement Plans: Aberdour

#### Planning Authority's Summary of the Representation(s):

**Aberdour Issues**

Aberdour Community Council (2087), Mary Taylor (644, 645), Tony Hasler (826), N I Thomson (857), Eric Roberts (605), Kenneth Miller (639), Graham, Robert & Rebecca Schulman (716), Susan Miller (942), Mr & Mrs A H McDonald (880), T J Oliphant (928), Freeda Davidson (816), Dr Maurice McKee (932), A R Davidson (811), Lois Hutchison (879), A P Griffiths (836), Fiona M Baxter (930), Susan D’Aish (736), Dorothy S McRae (815), Margaret MacMillan & George Marshall (858), Dorothy & John Cuthill (993), Dr Jill Duguid (1146), Gordon Maxwell (1003), M Kelly (1153), J Kelly (1145), R S Rennie (999), Sarah Paterson (874), Alan Brotchie (1081, 1157), A C Oliphant (940), A W Black (941), Barbara Harris (944), Steven Côt (976), Sarah White (982), Ann Côt (983), J R Slats (994), L Cunningham (995), Michael Fenner (997), Roy Marrian (1277), Margaret Rhodes (1155), Morag L Garvey (1170), R M D (1000), Sally McKee (1001), Alison Chapman (1141), Linda Davies (1151), Lorna McLinton (1152), Neil Craig (1512), P G Drumm (1358), Carrol Shepherd (1230), Owner/ Occupier (1273), Terence Garvey (1303), Nicky Byiers (1347), Caroline Beveridge (1351), Allan White (1391), Robin Smith (1584), Neil Craig (1482), Marion Caway (1636), Elizabeth Toal (1485), Archie Toal (1564), Joyce Ferrie (1617), Nicki Turton (1503), Richard Gregory (1497), T & W J Mann (1778), Sue Wilson (1790), Mrs Millar (1536), Shirley Glynn (1575), Norman Morrison (1578), Louis Ferrie (1601), James Scott (1594), Csaba Adamik (1619), Tracy Gordine (1635), Michael Izzi (1880), M G A Wilson (1851), Margaret JM Bald (1905), Sally McKenzie (1819), Craig McKellar (1862), Mrs Mann (1782), Sheila, Stanley & Alison Robb (1787), R & D Cameron (1792), P Blakeman (1794), Ms Uniacke (1818), Gertrud Mallon (2112), Neil Craig (1951, 2045), Carolyn Craig (1675, 1680, 2057), Sue Smith (2023), Jane W Hallvan (1852), Ethil Amos (1855), Anne Findlay (1869), D Crow (1872), Marjory M Burns (1898), Margaret Worrall (1902), M Hamilton (1908), M & Scott Christie (1911), Graham Birse (640), L Wahrloos (1925), L M Sutcliffe (1929), George Cormack (804), L Dryburgh (1932), Nancy Rice (2186), Elizabeth Graham (2385), Pauline Jones (2388), Ross Millar (2318), Annakin Lukanova-McGregor (2367), Margaret Skelton (2459), George & Linda Brown (2376), Audrey McGlynn (2378), Alice Hall (2381), David Lindsay (2384), Helen Jameson (2386), Judith Paris (2390), Irene Hendrie (2404), H McGregor (2416), C Matheson (2451), Caroline McGregor (2477).
Catherine M Miller (2479), Lesley Thomson (2496), Cochrane (2541), Carrie Todd (2672), Nicholas Garvey (2650), Ann Kelly (2656), Martin Bailey (2648), Ian & Lesley Gordon (2646), Carol Bailey (2632), Douglas McGregor (2592), G S W Stevens (2611), Sally Curtis (2623), Alison Lawson (2628), Alex Kelly (2631), Elizabeth Thomson (2636), Nigel Davies (2653), James Silvester (2664), Malby Goodman (2772), Alexander Harper (2730), Irene Wyse (2788), Catherine Duncan (2774), Anne & John Goodman (2835), Jill Travers (2721), Alison Cutforth (2830), Alexander Lawson (2723), Jennifer Shinsato (2724), Kevin Baird (2734), Xinting Su (2735), Simon Fraser (2737), James Wyse (2773), John Goodman (2775), Ken Lindsay (2780), John Taylor (2808), Ian Macfarlane (2868), Angela Leask (2889), Jennifer McCrae (3045), Cheryl Lindsay (2884), Marjory Socha (2928), Corrina Davies (2859), John Burrell (2862), Jill Nelson (2892), D E MacFarlane (2913), Graeme MacGregor (2929), Dr David Mallon (2945), Pauline Bald (3038), Jay Whimster (2933), Laurence and Kathleen Crowe (3082), Anne and Alastair Lamond (2930), Charbel Bouaoun (2935), Moira and Jim Mallon (2936), Fiona Buchanan (2937), H Jamieson (2942), I F Cochrane (2946), Joan Dryburgh (2948), Morrice McCrae (3025), J Gilmour (3037), Jennifer Graham (3047), Kirsty Stevens (3049), R B Flockhart (3050), Amy Travers (3057), Elaine Flockhart (3059), R Drummond (3101), E Gilmour (3134), Mary Meiklejohn (3456), Michael Proctor (3341), Rachael Burrell (3360), P Calder (3372), Ronald Kerr (3656), May & Ian Dempster (3667), Owner/Occupier (3669), M Haldane (3670), Owner/Occupier (3671), Owner/Occupier (3674), Yvonne Sloan (3735), Ruth Murray (3754), Glyn Chadwick (3766), Sally McKenzie (3740), Craig Mackellar (3741), Phyllis Lochter (3783), Kenneth Murray (3768), Roderick McKinnon (3785), Agnes and Alex Thomson (3772), Susan McKinnon (3788), Janice Macdonald (3745), Graham Neal (3787), P Cook (3750), Claire MacKenzie (3737), Roger M Harris (3755), Gregory Mitchell (3756), Alun R G Mitchell (3757), Fiona L Duncan (3758), Andrew Duncan (3759), Irene A Rennie (3760), J D Mitchell (3762), K Duncan (3763), Norma S MacKenzie (3773), Owner/Occupier (3774), Owner/Occupier (3775), Owner/Occupier (3776), Owner/Occupier (3777), Owner/Occupier (3778), Owner/Occupier (3779), Owner/Occupier (3780), David V Rennie (3781), L & B Ferguson (3782), Robert J Duncan (3784), T H M Nisbet (3786), William R Rennie (3790), David Cargill (3830), Geoffrey Hope (3821), Alison McNair (3822), Jane & David Duncan (3819), Mandy Abbott (3823), Kenneth M Sinclair (3832), Ylva Alexander (3833), Douglas Flockhart (3831), Michael Fenner (1379), Paula Van Hemert (1401), James Mulligan (1236), David Finnegan (1414), Michelle Cook (1667), Jill Sutherland (2243), Graeme Stevens (1390), Cora Todd (2854) Jennifer Shinsato (3202), Carol & Paul Connolly (3738): Supports decision by Fife Council to reject all the original proposed housing developments for Aberdour. Extending the village envelope would set a precedent and lead to further extensive developments into surrounding countryside. Concerns about loss of prime agricultural land, coalescence, access and road safety, traffic congestion, difficulties in providing secondary access to sites, impacts on village character and local facilities, landscape and tourism impacts, loss of habitat, sewage, flooding, lack of housing need and proximity to Braefoot Bay pipelines. Reference is also made to SESplan housing land requirement and sufficient land being allocated elsewhere to meet the targets.

Colin MacKenzie (2949): supports decision by Fife Council to reject all original housing developments for Aberdour. Aberdour is not automatically resistant to development proposals and highlights that village has absorbed a significant number of additional single house developments in recent years. Concerns about extending village envelope and creating “ribbon development”, loss prime agricultural land, access to sites, congestion, road safety, landscape and impacts on local infrastructure and services. Acknowledges councillors support for local views and states that sufficient sites have...
been identified elsewhere and only commercial developers would benefit from building expensive houses in Aberdour.

Aidan Douds and Gillian Johnston (2400): does not object and disagrees with Community Council views. Refers to limited availability of affordable housing and opportunities to move to larger property in Aberdour. A boost in housing stock could revitalise market. Fresh investment is needed to introduce 'new blood' to prevent the village falling into decline.

Non allocated sites

Candidate site LDP-ABD 001a Land to the north of Main Street

Cala Management Ltd (1243): supports development of site to north on Main Street Aberdour (candidates site LDP-ABD 001a). Site is effective and forms a natural extension to village. Aberdour is a sustainable and appropriate location for further limited growth. The village has range of facilities and school has capacity and village is served by rail station. Further housing will extend range and choice of housing. Reference is made to potential for roundabout to improve traffic safety.

Carolyn Craig (1675, 1680), Neil Craig (1951): objects to proposal to develop site to north of Main Street (candidate site LDP-ABD 001a). Site is outwith village envelope and is inappropriate due to size and position of the site and negative impact it would have on local community. Refers to SESplan housing land requirement having already been met, potential for increased congestion, road safety issues and adverse impacts on schools, doctors’ surgery and character of village.

Candidate site LDP-ABD001b Easter Aberdour (south of Main Street)

Campion Homes Ltd (1394): There is an overriding need for additional housing in Aberdour to meet needs of mainstream and affordable housing but site at Easter Aberdour (candidate site LDP-ABD001b) is not the most appropriate location for that allocation. Reference is made to prime agricultural land, sensitive, prominent location, impact on landscape and setting of Aberdour, traffic issues. The candidate site at Nether Bouprie Farm (candidate site LDP-ABD004) has been clearly demonstrated as the most appropriate site for new development and should be supported through the LDP process as the preferred option. Alternative effective site is available at Nether Bouprie Farm.

Cala Management Ltd (1242): supports development of site to south on Main Street Aberdour (candidate site LDP-ABD001b). Site is effective and forms a natural extension to village. Aberdour is a sustainable and appropriate location for further limited growth. The village has range of facilities and school has capacity and village is served by rail station. Further housing will extend range and choice of housing. Reference is made to officer support for site and potential for roundabout to improve traffic safety.

Neil Craig (1621), Carolyn Craig (1674, 1680), Mary Hayward (1673), Graham Stewart (2952), Alison Stewart (1590), Alexander Stewart (3027), East Aberdour Residents Group (3188): objects to proposal to develop site to south of Main Street (candidate site LDP-ABD001b). Site is outwith village envelope and is inappropriate due to size and position of the site and negative impact it would have on local community. Refers to loss of prime agricultural land, landscape impacts and potential for coalescence, potential for increased congestion, road safety issues and adverse impacts on schools, doctors’
surgery and character of village. Reference is also made to previous appeal decision in 1991 (Ref. P/PPA/FA/165&166)

Candidate site LDP-ABD 003 Land at Wester Aberdour

Gertrud Mallon (617), David Mallon (2945): Supports decision of the planners and Executive Committee to keep existing village envelope and exclude any new sites from the FIFEplan. Objects specifically to LDP-ABD003 (former candidate site to west of village) on basis of impacts on character of village, landscape and visual impacts, village boundary, SESplan housing requirements, traffic congestion, land ownership difficulties in achieving required visibility from access and provision of footpaths, house types, flooding issues and proximity to gas pipeline

Alison Stewart (1590): agrees with Fife Council’s decision that none of the candidate sites in Aberdour should be included in FIFEplan and there is no justification for any development site in Aberdour to be included in FIFEplan. Particular concerns about sites to east (candidate site LDP-ABD003) and west (candidate site LDP-ABD001b). Development would be contrary to Scottish Planning Policy, Scottish Development Plan and FIFEplan itself. Refers to potential impacts on traffic congestion and road safety concerns resulting from both proposals. Concerns also about scale of development, impact on infrastructure and village facilities, tourism, character of village, landscape and biodiversity, loss of prime quality agricultural land.

Campion Homes Ltd (1208): Supports decision by Fife Council not to allocate land to south of Inverkeithing Road (candidate site LDP-ABD 003). Site would not meet terms of Designing Streets, would be visually prominent. Visibility splays cannot be achieved and site is non-effective. Alternative effective site is available at Nether Bouprie Farm (candidate site LDP-ABD004)

R T Hutton (949): supports development of site to west of Aberdour (candidate site LDP-ABD003). Site is effective and small scale development would meet local demand and have little visual impact. Agreements are in place with third parties to secure necessary access and comments are provided on difficulties with pavement provision.

Candidate site LDP-ABD 004 Nether Bouprie Farm

Campion Homes Ltd (854): Supports site at Nether Bouprie Farm, Aberdour (candidate site LDP-ABD004) and highlights reduced scale of proposals from site previously considered as part of Local Plan Examination. Aberdour is sustainable location with a main line rail station and scale of proposals (75 houses) is appropriate and meets SESplan strategy. There has been no new housing development in last decade and there is sufficient drainage capacity and spaces in local schools. The site is well contained within existing landscape.

Candidate site LDP –ABD 005 Aberdour Golf Course

Aberdour Golf Club (1074) objects to non-inclusion of site for housing. Would meet a need for elderly people in Aberdour wishing to downsize, and suggests that an amendment to the settlement boundary may assist in gaining support for the development.
Allocated Sites

ABD 001 Hillside School

Gertrud Mallon (611): Object to site at Hillside School being carried forward in proposed FIFE plan and the designation of the site being changed from a Brownfield site to development land. Concerns about whether village infrastructure could accommodate 70 new houses on this site, access to the proposed new school at north end of Mill Farm Road would be difficult and, congestion on roads through Aberdour. If site cannot be removed developer requirements must be strictly adhered to. Also supports rejection of larger site proposed by developers.

David Graham (1415), James Bell (3096): Comments on previous allocation as ‘Brownfield’ site and objects to the proposed change in status of site to ‘Housing Development’. Questions need for new school and employment opportunities generated by proposal. Highlights existing sewerage issues in St Fillans Crescent and potential difficulties with access onto main road. Also references number of houses proposed.

Mary Taylor (703), Graham Birse (641), Kyle Mallon (2198): Size of proposed development threatens unique environment, character and conservation village status of Aberdour.

Alan Brotchie (882), John McAllister (968), Duncan Campbell (1198), Alison Stewart (1595), Richard Jarret (1597), Ruth Bell (1411), Dennis Bell (1412), Eunice Clason (1502), Kevin Muldoon (1510), Norman Morrison (1580), Joanna Morrison (1627), Lesley Bowie (1840, 2092, 2257), Sue Smith (2018), Nancy Rice (2160), Keith Goatman (2181), William Dryburgh (45), Roy Marrian (3862), Mary Hayward (1672): Object to proposal on the following grounds: development cannot be supported by current infrastructure. Concerns about impact on character of village, visual intrusion, impact on roads, additional traffic and congestion, sewerage, flooding, schools, medical practices, additional traffic, disturbance to natural environment, loss of farmland, destruction of habitat and protected species and loss of existing school and employment opportunities. Campion Homes Ltd (947), Campion Homes Ltd (1210): Site should be deleted from the Local Development Plan. Little likelihood that development would contribute to meeting housing needs in the area or contribute towards the effective housing land supply. There is no evidence provided related to development viability and there is no proposal/plan/developer in place. This site has hallmarks of a windfall site and cannot be considered to contribute towards land supply. The Local Plan and LDP allocation is undefined in terms of precise location and scale. Need justification for new school in sensitive landscape setting and how development will integrate with village. There is a preferred deliverable site at Nether Bouprie Farm within village which would deliver completions within Local Development Plan period.

Robin Smith (1615), Sally McKenzie (1858), Craig McKellar (1859), Gertrud Mallon (2207), David Mallon (2947): Concerns about transparency of change in status of proposal. Also comments on map showing site to be limited to the immediate area around current school and but developer requirements relate to watercourse and woodland outwith site suggesting much larger area is being considered. Comments on impact on size and character of village, precedent setting for further expansion of village, loss of prime agricultural land, access, traffic congestion and safety, landscape impacts, loss of habitats.
John Burrell (1475), Sally McKenzie (1858), Craig McKellar (1859): Whilst accepting original designation it is essential that all the caveats are adhered to should it ever proceed to planning. Comments on restricted area for 70 houses plus 30% employment and traffic impacts turning onto A921 and location for secondary access.

Janice McDonald (1528): Object to proposals to build more housing at other Aberdour sites. Agrees with some qualifications, to proposal at Hillside School (ABD001). Site at Hillside School would be an attractive, central location for retirement homes and limited development of this type would be acceptable.

Jill Sutherland (2243): Objects to any development of any part of the land at Hillside which goes beyond previous allocation and conditions regarding employment provision. Highlights concerns about infrastructure capacity, impacts on listed building, agricultural land, woodland or designed landscape, and wildlife. Concerned that process is weighted in favour of developers.

SEPA (3302): Support requirement for Flood Risk Assessment (FRA) and buffer strip along watercourse to be undertaken.

A Smith (1241): Support proposed allocation of ABD001, but ask Council to consider wider allocation of site to include all land south of plantation. Development of site will generate capital to provide new fit for purpose boarding school facility and maintain Hillside School within Aberdour. Comments on site assessments and provides information on phasing, type of facilities and extent of land ownership. A lower density development of 100 units is proposed with commuted sum towards affordable housing provision. Also references previous Local Plan Examination decision and states that scale of development would complement Strategic Development Areas and supplement land supply.

**Modifications sought by those submitting representations:**

**Aberdour issues**

Aidan Douds and Gillian Johnston (2400): requests boost in stock of housing in Aberdour

Cala Management Ltd (1243): include site to north of Main Street Aberdour (candidate site LDP-ABD001a).

Cala Management Ltd (1242): include site to south of Main Street Aberdour (candidate site LDP-ABD001b)

Campion Homes Ltd (854, 1394): include site at Nether Bouprie Farm (candidate site LDP-ABD004)

R T Hutton (949): include site to west of Aberdour (candidate site LDP-ABD003)

Aberdour Golf Club (1074): include candidate site LDP-ABD005 in plan

**ABD 001 Hillside School**

Campion Homes Ltd (947, 1210), Alan Brotchie (882), John McAllister (968), Duncan
Aberdour Issues- non allocated sites

Fife Council’s Executive Committee at its meeting on 9th September 2014 resolved to delete candidate site LDP-ABD 001b Easter Aberdour (south of Main Street) from the Proposed Plan (CD23)

Candidate site LDP-ABD 003 Land at Wester Aberdour

The site has poor integration with adjacent housing and access constraints. Whilst commitments have been received from third party owners of land required to facilitate the required visibility splays, (onto the A921) and vehicular access to the east of the site, the provision of the footway on the A921 frontage of the site will also require control of land within the frontage of third party property at Avandale. The control of the land has not been facilitated. The site was also considered as part of the Dunfermline & West Fife Local Plan Examination. The Reporter did not support this site citing landscape grounds and the settlement boundary logically follows the edge of built development and should not be extended (CD21 page 56)

Candidate site LDP-ABD 004 Nether Bouprie Farm

The site was considered at Dunfermline & West Fife Local Plan Examination for a slightly larger area of 8 hectares. The Reporter rejected the site, on landscape grounds, citing Structure Plan policy SS1 (CD21 page 56)

Site assessments undertaken in preparing the proposed LDP FIFEplan Site Assessments Report – Version 3 (CD15) were published by the Council in September 2014. The site assessments considered issues such as the impact on landscape, settlement character, and infrastructure. The site assessment published for the site (originally 100 houses but now reduced to 75) in Aberdour indicated that the proposed development is inconsistent with SESplan strategy in that it is inappropriate for Aberdour, which is not in a Strategic Development Area. The site area, extending to more than 6 hectares would be capable of accommodating well in in excess of 75 houses. This site is therefore not supported for housing development due to the proposed or potential scale of development. In addition, the site lies within Local Landscape Area and there does not appear to be any possibility that the site can be provided with additional vehicle accesses nor can it integrate with the settlement.
Candidate site LDP-ABD005 Aberdour Golf Course

The site was previously considered at the Dunfermline & West Fife Local Plan Examination. The Reporter rejected the site citing adverse impacts on the landscape and environmental quality of the area. (CD21 page 55)

Housing land issues

Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with under the Homes Schedule 4 – Issue 2B and its associated supporting paper

Allocated Sites

ABD 001 Hillside School

The site was previously identified in the adopted Dunfermline & West Fife Local Plan 2012 (CD8). The site area and indicative house numbers remain unchanged in the proposed Local Development Plan (LDP) however the description of the site has changed from Brownfield to Housing Opportunity site. The LDP no longer uses “brownfield opportunity” or “mixed use” descriptions and the name change is consistent with other brownfield sites previously identified across Fife.

The site area and boundary proposed in the LDP also match that included in the adopted Local Plan. It is also worth highlighting that the site area and proposed boundary submitted by the agents on behalf of the owners extended to more than 55 hectares and included a much larger development area, including residential proposals, to the north and west. The candidate proposal as submitted has not been accepted and the existing Local Plan boundary and site area allocation has been maintained in the LDP.

The site was also previously considered at the Examination of the adopted Local Plan (CD21 page 57) and the Reporter supported the inclusion of the site as a brownfield opportunity site but also stated the Council should review the settlement boundary as part of the new local development plan. At that stage the Reporter stated that the site should remain outwith the settlement boundary because the site is in operational use as a school and housing to the east of the site currently forms a strong boundary to the village. On this basis therefore, the settlement boundary remains unchanged in the LDP. Site assessments undertaken in preparing the proposed LDP FIFEplan Site Assessments Report – Version 3 (CD15) were published by the Council in September 2014. The site assessments considered issues such as the impact on landscape, settlement character, and infrastructure. The site assessment published for Hillside School concluded that large scale residential development submitted by the landowners is not supported on the site as it would have a negative impact on the landscape and would be out of scale and separate from Aberdour. The assessment also concluded that the northern part of the site is separate from Aberdour and intrudes into the landscape setting, affecting the approach from the north. The site also lies within the Local Landscape Area. Development could be accommodated on the lower part with good design. Development north of the plantation compromises Aberdour's landscape setting, distorting the shape/pattern of Aberdour and its relationship with the coast. In terms of school capacity, it was identified that there is some capacity in schools, with high school rolls projected to decrease
The developer requirements included in the LDP also refer to a requirement to submit a Transport Assessment, a Road Safety Audit, a Flood Risk Assessment, delivery phasing plan and business case, landscape assessment and minimum requirements for employment provision.

**Reporter’s conclusions:**

**Aberdour issues**

1. Some 76 representations express opposition to allocation of land for housing at Aberdour. Representations say that there should be no extension of Aberdour’s village envelope. Reference is made to the local plan examination that took place in 2012, which resulted in a recommendation that no sites at Aberdour be designated for housing development. Reference is also made to sufficiency of housing land allocations elsewhere in Fife, availability of school places, health care, drainage, impact on landscape, loss of prime agricultural land, access and road safety, traffic congestion and impact on village character.

2. I find that the planning policy context at the time of the 2012 examination is different from the context of the present examination. The strategic development plan, SESplan, came into force in June 2013. A new version of Scottish Planning Policy was published in June 2014.

3. The proposed local development plan must be consistent with SESplan. Among other things, SESplan (policy 7) says that sites for greenfield housing may be allocated in local development plans to maintain a five-year effective housing land supply. This is subject to development being in keeping with the character of the settlement and the local area and subject to availability of infrastructure.

4. Scottish Planning Policy (paragraph 110) says that the planning system should identify a generous supply of housing land and maintain at the least a five-year supply of effective housing land at all times.

5. The council’s 2015 Housing Land Audit identifies a shortfall in the five-year effective housing land supply for the SESplan area of Fife. I acknowledge the uncertainties expressed under Issue 2(b) Homes with regard to the level of this shortfall, but the adequacy of the land supply has not been demonstrated.

6. From the preceding considerations, I find that that it cannot be said that there is a policy presumption against identifying land for new housing at Aberdour.

7. Regarding availability of school places for school-age children living in Aberdour, site assessments indicate that there is some capacity in primary schools and high schools. I find that school capacity is not a reason for saying that there should be no housing development at Aberdour.

8. Regarding pressure on health care facilities, it has not been demonstrated that this is a problem peculiar to Aberdour. Nor has it been shown that there are other communities where health care facilities have spare capacity and where additional housing development would therefore be more appropriate.
9. The site assessments indicate that there is limited capacity at the Silver Sands waste water treatment works. They also indicate that this could be addressed if extra capacity were needed to serve new development.

10. I note that, with the exception of ground around Hillside School, the village is encircled by land that is designated as a local landscape area. In addition, some land is said to be of prime agricultural quality. In my view, these factors do not necessarily mean that there should be no extension of the village envelope. Rather, they point to a need for particular care in deciding whether there should be any such extension.

11. Matters relating to site access, road safety, traffic congestion and impact on village character are addressed in the sections below that relate to particular sites.

12. Submissions indicate that Aberdour is well-served by public transport, with bus services and a railway station. This favours new development at Aberdour in view of the support that is to be given to patterns of development which facilitate travel by public transport (Scottish Planning Policy, paragraph 270). On the other hand, this has to be balanced against the fact that Aberdour lacks certain facilities, so residents are likely to make journeys to other locations for purposes such as main weekly shopping, employment and secondary school education.

13. In my view, preparation of a new local development plan requires a review of all aspects of the existing plan and, from all the foregoing, I find that there is no justification for saying that there should be no allocation of land for new housing development at Aberdour. It is within this overall context that I consider each of the following sites.

Aberdour - Easter Aberdour, land to the north of Main Street (including candidate site LDP-ABD001a) and land to the south of Main Street (including candidate site LDP-ABD001b)

14. The submissions in support of residential development on a site to the north of Main Street and on a site to the south of Main Street contain much identical material. The Indicative Development Proposal document assesses both sites. It identifies three options: development of the south site only; development of the south site with a more modest development on the north site; and development of both sites. The last of these is seen as the preferred option and is the basis for an indicative layout.

15. The indicative layout includes construction of a roundabout on the eastward continuation of Main Street (A921). Access to both sites would be taken from the roundabout. The sites are larger than the related candidate sites. The site north of Main Street extends north-west as far as the north-east corner of houses around Humbie Terrace and as far east as the access track to Humbie Farm. The site south of Main Street extends south-east as far as the northern boundary of the railway line.

16. It is contended that SESplan requires more housing sites to be identified. In the plan-preparation process, deletion of housing sites at a late stage has made the proposed plan’s housing allocations even more deficient. The north site could accommodate a minimum of 40 dwellings. There could be a minimum of 100 dwellings on the south site, including the requirement to provide an allocation of affordable housing.

17. In the preceding section, I recognise that the council’s 2015 Housing Land Audit
identifies a shortfall in the five-year effective housing land supply for the SESplan area of Fife and I acknowledge uncertainties with regard to the level of this shortfall.

18. It is contended that the proposed development would provide choice in a location where new housing in the upper-market range is not currently available. Provision of executive housing is said to foster economic development. I note that Scottish Planning Policy, paragraph 110, says that the planning system should enable provision of a range of housing. I find that this may be done by identifying a suitable range of housing sites. I see no reason why upper-market housing might not be built on other sites if such sites are identified in the local development plan.

19. It is contended that Aberdour has good public transport links. I address this in the preceding section. Regarding need for new housing to support the local school, I am not aware of any likelihood that the primary school would close if there were no new housing in Aberdour.

20. It is contended that the proposed development would replace what is described as the existing fragmented, eastern edge of Aberdour by an attractive gateway with identifiable and clearly defensible boundaries.

21. I find that the present eastern edge of Aberdour is very clearly defined. Residential development is contained within the boundary of the village envelope. Outwith the boundary is farmland. There is a very sharp demarcation between the two.

22. The built-up area as seen from the east exhibits a variety of building forms and styles. It includes older, two-storey local authority housing, a bungalow, nineteenth-century housing, and more recent local authority housing. There is a variety of external finishes and colours. This variety reflects the variety of building types found within the village as a whole.

23. I find that the appearance of Easter Aberdour in its immediate setting as seen when approaching the village on the A921 from the east is distinctive, has local character and is not displeasing. I am not convinced that the proposed development would necessarily enhance this situation or ensure that Aberdour retains a strong sense of character and identity.

24. My conclusion is that the appearance of Easter Aberdour as seen from the east is not in need of improvement and that this appearance would not necessarily be improved by development on the representation sites.

25. It is contended that the proposed roundabout would improve road safety. I note from my inspection that the speed limit at the entrance to Easter Aberdour is 20 mph. It is apparent that the speed limit at the time when the representations were being prepared was 30 mph. It may be that the new speed limit is having a beneficial effect similar to that envisaged in connection with the roundabout.

26. There is a history of vehicles parked on Main Street and High Street being damaged by passing traffic. More importantly, my attention has not been drawn to any record of personal injury accidents in the vicinity of the representation sites.

27. The Indicative Development Proposal document says that the urban design strategy for the site will be based on traditional street design. I agree that this is a
desirable objective. In my view, a roundabout would not be compatible with traditional street design. It would create a feature in which road space is dominant. This would contrast with Main Street where the adjoining buildings are dominant and provide distinctive character.

28. The site assessment refers to lack of forward visibility for westbound vehicles on the A921. I note that the site to the south of Main Street includes woodland on the inside of the sharp bend just to the north-east of the two sites. It may be that felling of trees at this location would be needed to improve the forward visibility.

29. I find that it has not been demonstrated beyond doubt that a roundabout could be satisfactorily constructed as suggested in the representations. Felling of woodland might be involved. Any benefit in terms of road safety is likely to be of limited extent now that the 20 mph speed limit is in force. A roundabout would not be in keeping with the character of the nearby section of Main Street. My conclusion is that the prospect of having a roundabout is not a factor that lends weight to the case for development on the representation sites.

30. I note that, for a development of up to 80 units, the WSP report (page 24) predicts generation of approximately 40 vehicle trips per hour at peak times. The report goes on to say that, due to the predicted low increase in vehicle movements, no detrimental impact on operation of the local road network is expected. The employment destinations table on page 25 of the WSP report suggests that a high proportion of journeys to and from work made by occupiers of houses on the representation sites would use the A921 going through Aberdour. In the site assessment, the “Comments from Transportation” do not raise objection in principle to the proposed development.

31. From my inspection, I note the less than satisfactory traffic conditions caused by the restricted width of the A921 where it passes through Easter and Wester Aberdour. If there is to be new housing at Aberdour, it would appear that, other things being equal, the traffic interest favours a location towards the west side of the two villages as this would minimise any increase in congestion on Main Street and High Street.

32. It is contended that the two sites considered as a whole are well-contained by landscape features and the wider setting would not be compromised.

33. I find that the overall site is well-contained by existing woodland on the rising ground immediately to the east. Rising ground to the north also provides containment. The Indicative Development Proposal document shows substantial planting on the north side of the site. This would take time to grow and become effective as a landscape feature.

34. To the south, the railway line with its adjoining stone wall is described as a robust, defensible boundary. I agree that there is logic in using it as part of the site boundary. This is not to say that the railway line is significant in landscape terms. The line hereabouts is in cutting. Its presence is not apparent when looking south-east from Main Street or north from the recreational areas east of Hawk Craig Road.

35. At present, the recreational areas east of Hawk Craig Road have a setting that includes views north across the railway line to the rising ground beyond Main Street and north-east to the woodland on the steeply-sloping rising ground in that direction. Development on the representation sites would interrupt these views. In the context, it
would be seen as a considerable extension of the built-up area.

36. I note that the Indicative Development Proposal envisages that buildings would be kept back from the southern boundary and that there would be blocks of planting along the southern boundary of the site. At the same time, one aspect of the design strategy is that advantage should be taken of views across the recreational areas to the Forth. Thus it is not envisaged that landscape planting along the southern boundary would conceal built development.

37. The footway on the south side of Main Street continues eastwards out of the village. From the footway, a core path goes off to the right through the woodland that bounds the north-east side of the south site. From the footway there are views across the south site to the Forth and to Inchcolm. These views would be lost if the south site were to be developed.

38. During my inspection, I viewed the representation sites from Aberdour Castle and from other points in the surrounding area, including core paths. I found that development on the sites would have little or no effect on the wider surrounding area.

39. My conclusions are that the wider setting of Easter Aberdour would not be compromised in that the proposed development would have little or no effect on more distant views of the site, but the effect on the more immediate setting would be significant. The A921 approach to the village from the east would be radically altered, with a loss of character. The pleasant rural quality of the setting of the recreational areas east of Hawkcraig Road would be diminished.

40. I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the five-year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under issue 2(b) Homes with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that housing development on the two representation sites at Main Street would nevertheless be unacceptable because of the detrimental effect on the setting of Easter Aberdour. This detrimental effect outweighs the benefits of addressing any shortfall. I conclude that the two sites should not be allocated for housing development.

41. I now go on to consider whether one or other of the two sites on its own should be allocated for housing development. I first consider the site south of Main Street.

42. The representations refer to the fact that candidate site LDP-ABD001b (part of the site south of Main Street) was identified by the council as a preferred site. It was excluded from the proposed plan at a very late stage in the plan preparation process. I note from the site assessment that development of up to 40 dwellings was supported and that “Sensitive design could overcome landscape issues.”

43. I find that there are significant differences between the council’s preferred site and the representation site south of Main Street. The latter is a much larger site. The envisaged quantity of development was 40 dwellings on the preferred site and is 100 dwellings on the representation site.

44. The preferred site appears to me to be quite large for a development of 40 dwellings. It may be that the “sensitive design” to which reference is made in the site assessment might have involved restricting built development to that part of the site...
opposite numbers 89 to 105 Main Street, although, if this were the case, it leaves unexplained the reason for extending the site boundary across the field to the woodland. However, this point illustrates the significant difference between the preferred site development and the development envisaged in the representation.

45. My conclusion is that the differences between the preferred site and the representation site are so great that the argument for development on the latter can draw little or no support from the fact that site LDP-ABD001b was a preferred site.

46. I find that development on the south site alone would do little to reduce the adverse landscape effects of development on both sites.

47. Development solely on the site north of Main Street would form an intrusion into the zone of open countryside between the existing built-up area and the woodland and higher ground to the north-east. This would not be satisfactory in landscape terms.

48. My overall conclusion is that the proposed plan should not be altered.

**Aberdour - land at Wester Aberdour - candidate site LDP-ABD003**

49. During preparation of the proposed plan, candidate site LDP-ABD003, land at Wester Aberdour, emerged as a preferred site. It was not included as a housing site in the final version of the plan. The explanation for this, as given in the site assessment, is that the site has access constraints and poor integration. Land required to facilitate the required visibility splays onto Inverkeithing Road (A921) and to facilitate vehicular access to the east of the site was said to lie outwith the control of the representor.

50. The representation refers to what can be achieved on land owned by the representor and on third-party land over which agreement exists with the landowner. This includes visibility splays at the proposed entrance to the site from Inverkeithing Road, a pedestrian refuge crossing at a point on Inverkeithing Road where visibility in both directions is said to be good and a new footway on the south side of Inverkeithing Road to provide a link from the site to the centre of Aberdour. The representation says that the only concern expressed by council road engineers is in relation to the new footway where it goes past Avandale. At this point the width of the footway would be less than the Council's standard two metres.

51. Regarding vehicular access to the east of the site, the representation indicates that there is an agreement between the representor and the owner of 38 Bellhouse Road whereby the house at 38 may be demolished to permit construction of an access from Bellhouse Road into the site. The site assessment takes this further and says "[the] developer has purchased No 38 Bellhouse Road".

52. I note that the council does not dispute the sufficiency of the visibility splays proposed in the representation. On the basis that the representor has secured the necessary agreements to permit provision of the splays, I find that the first reason for not including the site in the proposed plan has been overcome.

53. The council does not dispute that the representor is in a position to provide an access between the site and Bellhouse Road. I find that the control that the developer has with regard to the house at no. 38 overcomes the second reason for not including the site in the proposed plan.
54. The only other reason given by the council for rejecting the site relates to the proposed footway where it goes past Avandale. The drawing accompanying the representation indicates that there is space within the road boundary to provide a footway that is 1.3 metres wide. During my inspection, I noted that, as stated in the representation, there are indeed locations towards the village centre where the width of the roadside footway is less than the desired two metres. In my view, this does not necessarily justify the arrangement illustrated on the drawing. If a width of two metres is necessary for the safety of pedestrians, it should be provided for new footways, especially where they are, as in this case, adjacent to a main road.

55. I find the position is not entirely clear-cut. It is apparent that the representation was prepared at a time when the speed limit on Inverkeithing Road was 30 mph. The limit is now 20 mph. This may have a bearing on the safety of pedestrians in relation to footway width.

56. There is a suggestion that a crossing point be provided so that pedestrians may use the existing footway on the far side of Inverkeithing Road, thus avoiding the narrow section of footway at Avandale. The representation drawing shows a pedestrian refuge in the centre of the road. It may be that other types of crossing could be provided if a crossing is deemed necessary.

57. Finally, there is the access to Bellhouse Road. This would enable occupiers of houses on the site to walk to and from the village centre along a quiet residential road instead of along the main road.

58. My conclusion is that the difficulty with regard to the width of footway at Avandale is not sufficient to justify rejection of the Wester Aberdour site.

59. Representations opposing development on the Wester Aberdour site question whether the developer would indeed have control over all the land which is outwith the site and which is required for provision of satisfactory access arrangements. I have no reason to doubt that the necessary control would be available.

60. The council’s response and representations opposing development on the Wester Aberdour site include references to: the danger of creating an access to Inverkeithing Road; poor integration with adjacent housing; use of Bellhouse Road as an exit route for the whole of Dovecot Park; lack of need for more houses in Aberdour; landscape effects and the appearance of the village; flooding; wildlife; proximity to the gas pipeline; and the examination report for the Dunfermline and West Fife Local Plan.

61. From my inspection, I note that the alignment of Inverkeithing Road along the site frontage and for some distance to the west is straight. East of the frontage there is a slight bend towards the south. On the basis that the visibility splays shown on the drawing submitted in support of development can be achieved and meet council standards, I find that the proposed access to Inverkeithing Road would be acceptable in terms of road safety.

62. The supporting representation suggests provision of an access from the site to Bellhouse Road. I find that this would provide good integration with the adjacent housing.

63. From my inspection, it appears to me that the Dovecot Park development contains
about 110 houses. I find that, if access were provided from Bellhouse Road to the Wester Aberdour site and thence to Inverkeithing Road, this would be a convenient route for Dovecot Park residents making journeys to and from destinations to the west of the village. Taking account of the size of the Dovecot Park development, I find that there would be a noticeable increase in vehicle movements along the western part of Bellhouse Road but that the scale of the increase would be well within the capacity of the road and would be acceptable in environmental terms.

64. Regarding need, or lack of need, for more houses in Aberdour, in the first section of these conclusions (Aberdour issues) I find that it cannot be said that there is a policy presumption against identifying land for new housing at Aberdour.

65. I now consider landscape effects and the appearance of the village. From my inspection, I note that, going west from the site frontage, the hedge on the south side of Inverkeithing Road has a height that is about two metres above road level. As a result, the site, and the existing houses on its east side, are not visible when approaching from the west. The northern part of the site is at about the same level as the adjacent road. There is a slight rise to the west of this part of the site. The remainder of the site slopes down to the south.

66. The features just described mean that houses on the Wester Aberdour site, especially if single-storey as envisaged in the supporting representation, would be likely to have little effect on the appearance of the village as seen from the approach along Inverkeithing Road. Removal of part of the hedge would be required to permit construction of the access and provision of visibility splays. This is unlikely to have a significant effect on the appearance of the development as a whole. New hedge planting behind the splays should be a requirement.

67. Although not drawn to my attention, I note two other matters in relation to landscape effects: the local landscape area designation and the St Colme House designed landscape.

68. With the exception of ground around Hillside School, Aberdour is encircled by land that is designated as a local landscape area. In my view, this does not necessarily mean that there should be no extension of the village envelope. Rather, it points to a need for particular care in deciding whether there should be any such extension.

69. The St Colme House designed landscape is shown on the spatial analysis maps (core document 15). The site assessment records Historic Scotland as advising “No significant issues. Developer requirements should consider screening to mitigate impacts.” From my inspection, I find that the site is on a peripheral part of the designed landscape. It is not visible from much of the rest of the designated area.

70. My conclusion is that development on the site, if carefully designed and landscaped, would not be unacceptably detrimental in terms of landscape and appearance of the village.

71. In the site assessment, the Scottish Environment Protection Agency says it requires an assessment of flood risk from the small watercourse which flows through the southern extent of the site. I find that this adequately addresses concern about flood risk.
72. I note that the site is used by wildlife. Development would displace this wildlife. There is an extensive area to the west which, like the site, is farmland and which would remain available for use by wildlife. I note from the site assessment that the site is not covered by a nature conservation designation and that no objection is raised by Scottish Natural Heritage. My conclusion is that use of the site by wildlife does not justify rejection of development.

73. Regarding the gas pipeline, the site assessment indicates that the site is not within the Health and Safety Executive consultation zone.

74. In relation to the previous examination report, the council specifically refers to landscape grounds and the settlement boundary. Regarding landscape, I note that the previous reporter found that development on the site would be contrary to structure plan policy and that this conflict would not be outweighed by the claimed benefits of development.

75. In the present case, SESplan, which has replaced the structure plan, says (policy 1B) that local development plans will ensure that there are no significant adverse impacts on the integrity of various designations. The designations include areas of great landscape value. For present purposes, I assume that the “local landscape areas” designation is equivalent to areas of great landscape value.

76. I have given careful consideration to the landscape aspects of the proposed development and my conclusion set out above is that a carefully designed and landscaped development on the site would not be unacceptably detrimental in terms of landscape and appearance of the village. In my view, the development would not have an adverse effect on the integrity of the local landscape area designation. In addition, one of the benefits of the proposal is that it would contribute to the housing land supply requirement contained in SESplan.

77. Regarding the settlement boundary, I agree that the existing settlement boundary is logical in that it follows the edge of built development. If the Wester Aberdour site is to be allocated for development, it would be equally logical to adjust the boundary so that it takes in the area envisaged for new development.

78. I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the five-year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under Issue 2(b) Homes with regard to the level of this shortfall. Nevertheless, I consider it appropriate that the Wester Aberdour site should be allocated for housing in advance of the early review of housing supply recommended under Issue 2(b) – Homes, for the following reasons:

(i) the site is capable of delivering completions in the next five years;
(ii) development on the site would not have unacceptable adverse impacts which would outweigh the benefits of addressing any shortfall when assessed against the wider policies of the plan;
(iii) development on the site for 20 houses would not undermine the strategy of the local development plan;
(iv) necessary access arrangements can be provided; and
(v) a structured environmental assessment process has been undertaken and there is evidence that public engagement has taken place.
As part of this local development plan examination, I am required to look at all of the evidence received in relation to the future development of Aberdour as a whole, including all of the proposed housing sites in Aberdour. In this context, it is not appropriate to consider sites in isolation, as would be the case in a planning appeal. My overall conclusion at the start of this section is that there is no justification for saying that there should be no allocations of land for new housing development in Aberdour. Taking all of the above into account, together with this overall conclusion, I find that this site at Wester Aberdour should be allocated for housing and the proposed plan should be altered accordingly.

Requirements in my recommendation reflect matters that are considered above and the following points. The drawing submitted with the supporting representation shows a 1.3 metre wide footway alongside Avandale. During my site inspection, I noted that the south part of the site adjoins woodland called Downans Plantation. In this woodland there are paths that are open to the public and that connect to the core path that skirts the golf course.

Aberdour - Nether Bouprie Farm - candidate site LDP-ABD004

Representation 854 seeks allocation of the Nether Bouprie candidate site for housing development. At an earlier stage in the plan preparation process, a development of 100 dwellings had been envisaged. The representation says that, following comments from the council and the local community, the scale of development was reduced to circa 75 dwellings and the structural landscape framework was enhanced. This was done following the Main Issues Report stage. The present representation therefore envisages erection of some 75 dwellings on the site.

The site assessment says that allocation of the site "is not supported for housing development due to the proposed scale of development (large scale), which is inappropriate for Aberdour". Later in the assessment, there is reference to "Development on this scale (100 houses) .....". The assessment also says that provision of additional accesses does not appear to be possible and the proposal affects prime agricultural soils. As these aspects of the assessment appeared not to be consistent with submissions in the representation, I requested further information (FIR 97).

In response to FIR 97, the council explains that the reference to “large scale” is based on the Hierarchy of Developments Regulations. Land required to form the proposed pedestrian link between the south-east corner of the site and Inverkeithing Road is understood to be outwith the control of the applicant. Agreement for a link through the cemetery may be difficult to obtain. A small part of the site is prime agricultural land, most of the site is class 3.2.

I first give consideration to matters regarding landscape. The council says that the site assessment considered impact on landscape and the site is within a local landscape area. The council also says that a slightly larger version of the site was considered at the Dunfermline and West Fife Local Plan examination. The reporter rejected the site on landscape grounds, citing structure plan policy.

I note that the site assessment says that the proposed development rounds off Aberdour behind ribbon development but extends Aberdour into rolling farmland setting. The assessment goes on to say that the site is within the local landscape area and “buffer of Designed Landscape”. There are references to changing sense of arrival from
the west, intensifying perception of built development from the north-west, compromising the landscape setting for Aberdour and the site being very visible from B9157/A921.

86. From my inspection, I note that hardly any of the built-up area of Aberdour is visible from the A921 as one approaches from the west. It is only when one is within 200 metres or so of the built-up area that the house at the west end of the ribbon of development on the north side of the road (Inverkeithing Road) comes clearly into view. As noted in the site assessment, the proposed site - or most of it - is behind this ribbon and development here would have little effect on the appearance of the village as seen from A921. The chief effect would arise from provision of an access road into the site and from development within the south-west part of the site, which is the part of the site that fronts onto A921. This part of the site is open to view from the A921.

87. The master plan accompanying the representation shows structural planting to the west of the site entrance area. Most of this planting is outwith but next to the boundary of the candidate site. I find that, if substantial planting were provided here, the proposed development would have no adverse effect on the appearance of Aberdour as seen from A921. However, I have insufficient evidence to show that this planting could be provided outwith the boundary of the candidate site. Without this planting, the appearance of the proposed development at this important entrance to Aberdour would be unsatisfactory.

88. Regarding a buffer of designed landscape, I note from the spatial analysis plans (core document 15) that there is a gardens and designed landscapes notation covering land on the south side of A921. This is associated with St Colme House. The site assessment records no objection from Historic Environment Scotland. From my inspection, I find that the proposed development would have an insignificant effect on the St Colmes House designed landscape.

89. From my inspection, I find that a significant landscape effect would be seen from Mill Farm Road. From one section of this road, the ribbon of development on the north side of Inverkeithing Road can be seen. Most of the ribbon consists of single-storey houses, partly screened by the ridge within the candidate site. The house at the west end of the ribbon is fully in view. It has two storeys and is fairly prominent. The overall effect of this part of the built-up area on the landscape is muted. The proposed development would have a much greater impact. Virtually the whole of the proposed built development would be in view. Generous landscaping is suggested in the master plan, but some of this planting is on land that is on the north side of the railway line and is outwith the candidate site. Again, I have insufficient evidence to show that this planting could be provided and that the landscape effect as experienced from Mill Farm Road would be acceptable.

90. Regarding the local landscape area designation, I note that, with the exception of ground around Hillside School, Aberdour is encircled by land that is designated as a local landscape area. In my view, this does not necessarily mean that there should be no extension of the village envelope. Rather, it points to a need for particular care in deciding whether there should be any such extension.

91. With regard to the previous examination, I note that the previous reporter found that development would fail to protect the landscape and that this would have been contrary to structure plan policy. In the present case, SESplan, which has replaced the structure plan, says (policy 1B) that local development plans will ensure that there are no significant adverse impacts on the integrity of various designations. The designations...
include areas of great landscape value. For present purposes, I assume that the “local landscape areas” designation is equivalent to areas of great landscape value.

92. My consideration of the landscape aspects of the proposed development lead me to the conclusion that the appearance of the proposed development would be unsatisfactory and would infringe SESplan policy 1B unless all of the structure planting indicated on the master plan were provided. As essential parts of this planting are outwith the candidate site and I have insufficient evidence to show that this planting could be provided, I am unable to conclude that development on the site would be satisfactory in terms of landscape and appearance of the village.

93. I now give consideration to vehicle access. As already noted, the council says that there does not appear to be any possibility that the site can be provided with additional vehicle accesses. The representor, in responding to the request for further information, refers to other sites where use of a single vehicle access appears to have been acceptable in the past.

94. I note current government advice is that policies should be guided by the six qualities of successful places (Scottish Planning Policy, paragraph 29). One of these qualities is that development should be easy to move around (Creating Places, page 11). I find that this implies good connectivity between new development and its host community. Bearing this in mind and given the size of the proposed development, I agree with the council’s concerns regarding additional vehicle accesses.

95. Regarding pedestrian accesses, the master plan accompanying the representation shows a pedestrian link between the south-east corner of the site and Inverkeithing Road. It also shows a footpath link going east from the site in the direction of the cemetery.

96. Without the link to Inverkeithing Road, residents within the proposed development who wished to walk to the shopping centre, railway station or primary school would initially have to go in the opposite direction to reach Inverkeithing Road at the west end of the site, then turn towards their destination. Provision of the link would result in a direct, much shorter route and would encourage travel on foot. I find that without this link the proposed development would be inadequately connected to the existing village.

97. In answer to the request for further information (FIR 97), the council says that the link to Inverkeithing Road is outwith the control of the representor and cannot be delivered as an integral part of the proposed development. The representor says that provision of this link has not, as yet, been fully explored due to the present status of the subject site. I find that at present there is no guarantee that the link could be provided. The merits of the proposed development must therefore be assessed on the basis that the link might not be provided.

98. Regarding the other proposed pedestrian link, I note from my inspection that the cemetery already appears to be used to gain access to the “Beautiful Wild Fife” area between the cemetery and the proposed development site. However, I am not convinced that adding to the use of a route through an operational cemetery would be ideal. This would in any case have to be the subject of detailed local consultation.

99. I therefore find that there is no assurance that there would be one or more pedestrian links between the site and the village centre. For this reason, there is no
guarantee that the proposed development would be satisfactorily integrated into the existing village.

100. I note that the 75 houses proposed for this site, when added to the number of dwellings that might be erected on the Hillside School and Wester Aberdour sites, would amount to a significant increase in the size of Aberdour and its population. This amount of development would not necessarily be inappropriate if it were acceptable in relation to all other considerations. The council says that the representation site could accommodate well in excess of 75 dwellings. I find that this is not a difficulty. If it were found that development of no more than 75 dwellings were acceptable, this limit could be stated in the proposed plan.

101. I note from the submissions that a convenience shop in Aberdour has closed and a hotel has partially closed. I accept that additional housing in Aberdour would help maintain local shopping and related services.

102. The site assessment says that the development would affect prime quality agricultural land. The spatial analysis mapping (core document 15) shows a thin sliver of land within the north-west corner of the site as being of prime quality. I find that the effect of development on the prime quality land resource would be insignificant.

103. The representor states that the proposed development is deliverable. I find that, if the site were allocated for housing, it would be effective.

104. It is also submitted that Kingdom Housing Association has identified Aberdour as an area of high priority for affordable housing and has indicated support for the proposed development. I find that the prospect of new affordable housing development counts in favour of the proposed development.

105. The representation says that the proposed development would help meet presently-unmet housing needs. I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the five-year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under Issue 2(b) Homes with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that this site would nevertheless be unacceptable because the evidence does not demonstrate that development would be satisfactory in terms of: appearance and impact on the landscape; provision of vehicle access; and adequate connection to and integration into Aberdour. These deficiencies outweigh the benefits of addressing any shortfall, provision of affordable housing and the possible maintenance of existing services. The arguments with regard to the impacts of this scale of development do not alter my view.

106. On balance I conclude that the Nether Bouprie site should not be allocated for housing development. The proposed plan need not be altered

Aberdour - Aberdour Golf Course - candidate site LDP-ABD005

107. The Aberdour Golf Course site has frontages to High Street, Park Lane and Dovecote Park. It contains a number of trees. The frontage to High Street is part of a very grand entrance gateway. The gateway has curved sandstone walls, sandstone piers, railings and ornate pedestrian gates. The site is immediately behind the east side of the gateway. On the opposite side of the gateway is an imposing lodge house.
108. The site is within the conservation area, it is the northernmost tip of an area designated as protected open space and it is also part of an area designated as a local landscape area. These provisions are repeated in the proposed plan.

109. I find that the woodland on the site makes a positive contribution to the character of the conservation area and adds to local amenity. The woodland also complements older trees that are likely to be remnants of avenue planting along the access road beyond the entrance gateway. Residential development on the site would require, at the least, removal of most of the trees. This would be detrimental to the character of the conservation area and detrimental to local amenity.

110. The present arrangement, with the lodge house to one side of the entrance, is typical of nineteenth-century estate development. The proposed residential development would detract from this arrangement. It would be likely to adversely affect the overall balance and quality of the architectural composition of gateway and lodge house.

111. The site is well-located for access to local facilities and public transport. The proposed development could help meet a need for smaller dwellings for older people.

112. I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the five-year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under Issue 2(b) Homes with regard to the level of this shortfall. Regardless of the level of shortfall identified, and notwithstanding that the site is well-located for access to local facilities and public transport and the proposed development could help meet a need for smaller dwellings for older people, I find that this site is nevertheless unacceptable because of the various detrimental effects identified above. These detrimental effects outweigh the benefits of addressing any shortfall in housing land supply.

113. My conclusion is that the proposed plan should not be altered.

Aberdour - Hillside School - site ABD 001

114. In the current adopted local plan, the Hillside School site is identified as a brownfield opportunity site. It has an area of 4.2 hectares. Its estimated capacity is shown as 70 dwellings. Developer requirements include retention of a minimum of 30% of the site for employment purposes. In the proposed plan, the same site is shown as a housing opportunity site with an estimated capacity for 70 dwellings. Development requirements include the same reference to retention of a minimum of 30% of the site for employment purposes.

115. A number of representations object to inclusion of the Hillside School site in the proposed plan. Other representations object to any extension of the Hillside School site. Representation 1241 seeks an extension to the site. This last representation refers to a number of documents. By means of an informal request, the council was asked to provide these documents. This was done in an e-mail dated 22 April 2016. As well as the requested documents, the council provided a “Council Response” document. Following this, requests for further information (FIR 98) were issued, seeking further clarification regarding representation 1241.

116. Candidate site LDP-ABD002: Hillside shows a site boundary that takes in the
Hillside School site and additional land to the north, west and south. Its area is 55 hectares. What representation 1241 seeks is allocation of a site that, in broad terms, is the south half of the candidate site. The desired site has an area of 22 hectares. It includes the Hillside School site and land to the west and south. The representation seeks an allocation that would permit residential development of some 90 dwellings.

117. With regard to representations that say that the Hillside School site should be deleted from the proposed plan, I note the following points.

118. The site contains a significant amount of existing development. Hillside House is a listed building, category B. The site assessment also refers to a listed walled garden, category C. From my inspection, it is apparent that a number of substantial school buildings have been erected beside and behind the house.

119. Representation 1241 says that, in order to sustain the school going forward and allow growth potential, providing a new, fit-for-purpose facility is seen as critical. Thus there is a wish for the school to vacate its present accommodation and move to a new, purpose-built facility.

120. Submissions do not suggest that the existing school buildings, apart from Hillside House, would attract new occupiers. The Design Statement of April 2010 (section 4.1) says the school buildings are, in the main, of unexceptional quality and will require demolition.

121. The Hillside School site, or at least a significant part of it, is brownfield.

122. The site assessment identifies no insuperable infrastructure issues.

123. Redevelopment of the school site is intended to generate capital that would contribute to the cost of relocating and maintaining Hillside School within Aberdour.

124. From these points, I find that, as the school accommodation may become vacant, it is appropriate to consider what other development might be acceptable on the site. I find that residential redevelopment would offer opportunity to enhance the setting of Hillside House and would be an acceptable use for the site. I therefore conclude that the Hillside School site (ABD 001) should be retained in the proposed plan as a housing opportunity site. I note the comments with regard to the effectiveness of the site but the council only counts 15% of those sites constrained by marketing towards the effective housing land supply. This minimal percentage reflects the council’s view that many of these sites are not expected to be effective in the plan period.

125. I now turn to representation 1241, which seeks an extension of the Hillside School site to create a site of 22 hectares for development.

126. Representation 1241 says that development of the 22-hectare site will generate the capital required to relocate and maintain Hillside School within Aberdour. I am not aware of any planning permission for a new school having been granted. I am not aware of any site at Aberdour having been identified in the current adopted local plan or in the proposed plan for relocation of the school. In my view, the absence of these matters means that the planning authority is not in a position to ensure that proceeds from residential development would be applied to construction of a new school at Aberdour. I conclude that the statement that proceeds from the residential development
would be applied to construction of a new school carries little or no weight when considering the merits of development on the 22-hectare site.

127. Representation 1241 says: “Development of land south of the plantation envisages a capacity of c 90 units (Appendix A).” Appendix A is a sketch plan showing removal of all existing buildings except Hillside House and erection of some 90 houses on land behind Hillside House and extending westwards. Substantial planting is shown between the west side of the development and Mill Farm Road. Ground within the southern part of the site is shown as “parkland”.

128. Representation 1241 says: “The case for development of land south of plantation is set out in Appendix B.” Appendix B is a Design Statement dated April 2010. The development site in the Design Statement is broadly the same as that depicted in the Appendix A sketch plan. The Design Statement includes an illustrative design concept. It refers to “a minimum allocation of the density shown in this submission, which is likely to be approximately 60 units.” The concept plan shows a low-density housing development, including some houses on the southern part of the site (the “parkland”).

129. The representor’s response to the request for further information (FIR 98) says that the allocation which is being sought is for the area of land coloured red on the plan entitled Development Areas, reference 006/001A. This area corresponds with the southern half of candidate site LDP-ABD002.

130. The site assessment is for candidate site LDP-ABD002. It therefore takes in a much larger area (55 hectares) than that for which an allocation is being sought (22 hectares). The assessment includes the following: “Development could be accommodated on lower part with good design” and “Majority of site frontage lies on derestricted roads. Therefore, formation of new vehicular accesses (T-junction) from Mill Farm Road and B9157 is not acceptable for reason 1.1”.

131. Regarding the reference to development on the lower part with good design, the council explains that it supports development on some of the land shaded red on drawing number 006/001A, namely the land that is identified in the proposed plan as proposal ABD 001. The council does not support additional development on the rest of the area shaded red.

132. Regarding reason 1.1, the council explains that this refers to a council policy against the formation of new vehicular accesses or the increase in use of existing accesses on unrestricted distributor roads (60 mph) outwith established built-up areas. The built-up area, from a transportation point of view, is defined as the area within a 30 or 40 mph speed limit. The reason for the policy is that such vehicular accesses introduce, or increase, traffic turning manoeuvres which conflict with through traffic movements and so increase the probability of accidents occurring, to the detriment of road safety.

133. I first give consideration to matters of landscape and townscape.

134. It appears to me that Hillside House was positioned and designed to have an outlook to the south, across land that slopes down to the Dour Burn and then rises towards Main Street. The relationship of house to landscape can be appreciated in views from adjoining roads, including Main Street. The representation seeks an allocation that could mean some residential development on the ground in front of or to
the south of the house. I find that this would be detrimental to the existing arrangement.

135. If development were confined to a westwards extension of proposed site ABD 001 (as suggested in the Appendix A sketch plan), this would result in an area of new development poorly related to the built-up area of Aberdour. It would be connected to the existing built-up area only by the Hillside School redevelopment site on its east side.

136. The Design Statement (section 5.3) says that the envisaged low-density housing “suitably reflects and successfully integrates into the local context”. From my inspection of the locality, it appears to me that traditional development in Aberdour is of a fairly high density. By contrast, within the adjoining countryside mansion houses are set in spacious surroundings. I am not convinced that development on the proposed extension of site ABD 001 would reinforce or enhance the existing character of the village or its surroundings.

137. I note from the Design Statement (section 4.1) that the development would occupy land that separates the two historic villages of Wester Aberdour and Easter Aberdour.

138. My conclusion is that the sought-for allocation would result in development that would be detrimental to the townscape and landscape of Aberdour and its setting.

139. Vehicle access to the proposed development from the public road network is envisaged at two points - from Main Street where the existing school access is located and from Mill Farm Road. From my inspection, I note that the existing access is immediately beside The Glebe. This is not mentioned in submissions as being a difficulty. From this, I presume that there is no land ownership hindrance to provision of a suitable access arrangement if the proposed development were to proceed.

140. Regarding the council’s criticism of the proposed access from Mill Farm Road, it appears to me that this issue has not yet been fully explored. For example, consideration does not appear to have been given to the possibility of extending the speed limit out to the proposed access location. I find that it has not been demonstrated that access is a reason for rejecting the proposed allocation.

141. I note submissions regarding the representor’s wish to move the school to purpose-built accommodation on a new site. It appears that the council is yet to agree to the location for the new school. Agreement regarding location would need to be followed by approval of a detailed design. Funding would also have to be secured. This could all take a significant amount of time, and I have no assurance that the proposed allocation site would be available for the construction of housing in the next five years.

142. I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the five-year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under Issue 2(b) Homes with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that the extended ABD 001 site would nevertheless be unacceptable because of the adverse townscape and landscape impacts identified above, which would outweigh the benefits of addressing any shortfall and because I am not satisfied that the site is capable of delivering house completions in the next five years.

143. I conclude that the proposed plan need not be altered.
**Reporter's recommendations:**

I recommend that the following modifications be made:

1. On page 21 of the proposed plan, insert the following:

<table>
<thead>
<tr>
<th>Ref</th>
<th>ABD 002</th>
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<tr>
<td>Location</td>
<td>Land at Wester Aberdour</td>
</tr>
<tr>
<td>Area (ha)</td>
<td>1.5</td>
</tr>
<tr>
<td>Description</td>
<td>Housing</td>
</tr>
<tr>
<td>Est capacity (Housing)</td>
<td>20</td>
</tr>
<tr>
<td>Lead Agency</td>
<td>Private sector</td>
</tr>
</tbody>
</table>

**Status, additional development requirements, and other information**

- The site is suitable for single-storey houses only.
- Access from Inverkeithing Road must incorporate visibility splay areas that accord with council design standards.
- A footway that is two metres wide must be provided along the frontage to Inverkeithing Road and be continued along that part of Inverkeithing Road that adjoins the grounds of the house at 30 Bellhouse Road. The footway must then be continued eastwards to connect with the existing footway immediately east of Avandale. This last part of the footway may, if unavoidable, be less than two metres wide but must not be less than 1.3 metres wide.
- A crossing must be provided so that pedestrians may cross Inverkeithing Road between the new two metres wide footway and the existing footway on the north side of the road.
- Vehicle and pedestrian access must be provided from the site to Bellhouse Road.
- A flood risk assessment is required. Design of development must take account of the findings of the flood risk assessment.

**Green Network Priorities:**

- High-quality landscaping must be provided on the Inverkeithing Road frontage, taking into account that this location is the entrance to the village. New hedging to replace hedging removed to provide visibility splays will be required.
- A high-quality edge must be provided along the western boundary of the development.
- Built development must be no closer to the trees that adjoin the site than a distance that is equal to the height of the trees plus five metres.
- A wildlife habitat area incorporating a SUDS drainage feature must be provided in the south of the site.
| A pedestrian link must be provided between the site and the woodland that adjoins the south part of the site. |

2. On the Inset Map - Aberdour, include candidate site LDP-ABD003, Land at Wester Aberdour, as a site for housing and include it in the settlement envelope.
<table>
<thead>
<tr>
<th>Issue 10</th>
<th>Kirkcaldy &amp; Dysart, Burntisland &amp; Kinghorn</th>
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<tr>
<td>Development plan reference:</td>
<td>Settlement Plans: Burntisland (pages 33 – 34), Kinghorn (page 106), Kirkcaldy and Dysart (pages 110 – 123) and Countryside Proposal LWD 002 (page 182)</td>
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<tr>
<td>Reporter:</td>
<td>Richard Dent</td>
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<td>Body or person(s) submitting a representation raising the issue (including reference number):</td>
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<tr>
<td><strong>BURNTISLAND</strong></td>
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<td>Burntisland issues</td>
<td></td>
</tr>
<tr>
<td>Ron Edwards (22)</td>
<td>KDY017</td>
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<tr>
<td>Cllr George Kay (758)</td>
<td>Forbo Flooring UK Ltd (925)</td>
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<td>Scottish Enterprise (1056)</td>
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<td>Inchcolm Land Ltd (1160, 1162)</td>
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Provision of the development plan to which the issue relates:

Settlement Plans: Burntisland, Kinghorn, Kirkcaldy and Dysart and Countryside Proposal LWD 002

Planning authority's summary of the representation(s):

BURNTISLAND

Burntisland Issues

LRH Enterprises Ltd (1995, 2010, 2013): Object to the non-allocation of candidate sites LDP-BUR001, LDP-BUR002 and LDP-BUR003 (Newbigging Farm sites 1, 2 & 3). Site LDP-BUR001 could provide local scale development that would be consistent with SESplan. Recognize that sites LDP-BUR002 and LDP-BUR003 would involve a strategic scale of development that would be inconsistent with the SESplan spatial strategy.

SESplan Supplementary Guidance allows for an additional 1950 houses outwith the Strategic Development Area’s (SDA’s). FIFEplan must regard SESplan Policies 1b and 7 when allocating this allowance. This additional supply should be divided between the two HMA’s in SESplan using the same 70/30 split used for the housing land supply for this area. This would give an additional supply of 585 units in the Kirkcaldy, Glenrothes and Central Housing Market Area (HMA). If the housing supply target was increased by the additional 10-20% promoted by Scottish Planning Policy this would increase the additional allowance units in the Kirkcaldy, Glenrothes and Central HMA to 702 units.

The Proposed FIFEplan housing land supply includes the new Local Development Plan allocations and an allowance for windfall allocations. Windfall sites should not count towards meeting the housing land requirement as per PAN2/2010. Excluding this allowance would create a shortfall of 1200 units over the plan period. Fife Council Executive Committee on 9th September removed a number of proposed new allocations including 172 units within the Kirkcaldy, Glenrothes and Central HMA. Additional sites such as site LDP-BUR001 should be allocated to compensate for the loss of this supply.

The delivery of the Strategic Development Area’s across SESplan will extend beyond 2026 as indicated in the FIFEplan Action Programme. The effectiveness of these areas and other sites included in the housing supply is questionable under the criteria set out in PAN 2/2010. The failure of these sites is not just due to market conditions. SESplan Supplementary Guidance required sites already identified for housing to be reassessed. It is not clear if such an assessment has been carried out. FIFEplan will fail...
to deliver the SESPlan housing land requirement and should allocate additional sites to address this.

The FIFEplan strategy for Burntisland significantly revises proposals in the adopted Mid Fife Local Plan; in particular designating the East Dock area and proposals BUR 008 and BUR 010 as employment land rather than the East Docks Strategic Land Allocation (SLA). SESPlan advises that one of the plans priorities is the delivery of the development strategy and related infrastructure projects currently committed through existing plans and strategies; the objective to regenerate Burntisland through the reuse of brownfield land should therefore remain despite the removal of the East Docks SLA and FIFEplan should consider alternative measures which reflect the spirit and intentions of the Mid Fife Plan strategy. The current proposals for Burntisland fail to do this.

Allocating additional housing land is key to safeguarding the economic future of Burntisland. The FIFEplan housing allocations made in Burntisland are either nearing completion or have questionable effectiveness; only proposal BUR 002 Grange Farm has a realistic prospect for delivery within the plan period.

The site assessment for LDP-BUR001 comments on its location within a Local Landscape Area and the adverse impact that development on the site would have on this landscape setting. It is considered that the site does not currently have any special landscape quality value and that development would offer an opportunity to improve a fairly low quality settlement edge.

Regarding the capacity of the primary and secondary schools the site assessment was carried out before the opening of the new primary school, projected rolls indicate that there adequate capacity exists. Capacity is an issue at Balwearie High School but this is being addressed through wider interventions.

Candidate site LDP-BUR001 would meet the requirements of the SESPlan policies and could make a contribution at a local level consistent with the SESPlan spatial strategy. The site is effective and could be delivered early in the plan period. It would be a sustainable development, would promote sustainable forms of travel and would not require investment in additional infrastructure. The site is free of constraints relating to slope, aspect, flood risk, ground stability and vehicular access; it is unlikely to have insurmountable contamination issues; the site is financially viable and there are no issues of deficit funding. Burntisland is a desirable location which has performed above average through the downturn in the housing market.

Ron Edwards (22): A number of the candidate sites that were considered for FIFEplan would create an unacceptable level of environmental and amenity damage. LDP-BUR002 and LDP-BUR003 are beyond the natural boundary of Burntisland effectively joining Burntisland and Starleyburn and reducing the separation of Burntisland and Aberdour to an unacceptable degree. Development of the steep and highly visible site LDP-BUR003 would cause considerable damage to this stretch of coast.

Candidate site LDP-BUR001 is the best alternative site in the Burntisland/Kinghorn area; it is a natural boundary extension to Burntisland and would have very limited environmental impact despite being prime agricultural land.

Scottish Enterprise (1056): Support the identification of the Port as a safeguarded employment site.
Inchcolm Land Ltd (1160): Object to the deletion of Mid Fife Local Plan proposal BUR13 Seamill for a residential care home and associated care facilities. Outline and reserved matters planning applications had been granted for this site but have lapsed due to economic issues and no operator interest. The proposal is part of wider community led redevelopment proposals for this part of Burntisland and would provide community facilities and employment opportunities. Key to the delivery of this proposal is a consistent development plan position; the deletion of proposal BUR013 would remove this positive position.

Improved economic conditions means many delayed projects are beginning to move forward again. Inchcolm Land Ltd have been approached by Balhousie Care Group who have confirmed their intention to become the operator for the proposed care home, this could be prejudiced by the proposal to delete the allocation in FIFEplan. The reasons for the deletion of this proposal are no longer valid and the proposal should be retained in FIFEplan.

Inchcolm Land Ltd (1162): Objects to the non-allocation of Candidate Site LDP-BUR005, Land at Seamill Road, for housing.

Scottish Planning Policy requires Planning Authorities to actively manage the housing land supply. There is a current shortfall in the 5 year effective housing land supply allocated in FIFEplan. Compliance with SESplan would require significant amounts of new housing land to be identified within the SESplan part of Fife; and it is critical that any additional land allocated is deliverable and effective under the six effectiveness criteria set out within PAN2/2010.

The land at Seamill is a logical, sustainably located, easily deliverable site which meets the effectiveness criteria: the site is within the ownership of a developer willing to make it available for residential development; the site is free from constraints; previous use has not resulted in contamination of the site; no public funding is required to make residential development economically viable; the site can be developed in the plan period; any required infrastructure can be provided; and ownership and marketability point to housing being a realistic option. The Seamill proposal for 60 units is projected to commence in 2016 with an 18 month build period.

SESplan aims to steer new development to the most sustainable locations. The SESplan Supplementary Guidance confirms that FIFEplan can allocate land for 1950 units outwith the SDAs subject to compliance with Policy 1B (Spatial Strategy Development Principles) and Policy 6 (Housing Land Flexibility). Policy 7 (maintaining a Five Year Housing Land Supply) will apply. The principle of allocating land at Seamill, Burntisland would accord with these policies in that there are no impacts on any environmental, built, cultural heritage or green belt designations, the proposal can be designed to comply with proposed Policy 11: Low Carbon Fife, the site is brownfield land and currently allocated for development in the Mid Fife Local Plan (BUR13), the allocation is in keeping with the character of the settlement and any required infrastructure can be delivered without public expense.

Scottish Planning Policy introduces “a presumption in favour of development that contributes to sustainable development” and requires that planning should support development that is designed to a high-quality, which demonstrates the six qualities of successful places. Development at Seamill, Burntisland can accord fully with these six qualities.
Forth Ports Ltd (1722): Support the designation of the Port of Burntisland as a safeguarded employment area this reflects its industrialised nature. A minor modification is required to the boundary to correctly reflect the operational land of the Port of Burntisland.

NHS Fife (3836): Housing allocations in the Burntisland area could impact on healthcare services, further discussions with National Health Service Fife are advised.

Cllr George Kay (758): There is inadequate provision for the growth of Burntisland. Proposal BUR 003 is too steep and will never be developed, 40 units on the cinema site is not feasible and Proposal BUR 001 is nearly complete. Around 200 houses would be needed in addition to some smaller sites identified (which would provide around 70 units) in order to sustain the community. Land at Red Mud Pond and to the west of Bendameer Road should be considered for development.

BUR 001 Alcan Site

Persimmon Homes (East Scotland) (1966): Need to clarify if the capacity (96) shown for proposal BUR 001 is the remaining capacity or the total for the site in order to determine the impact on the LDP Housing Supply.

LRH Enterprises Ltd (1996): Proposal BUR 001 will be completed by the time the LDP is adopted.

The Woodland Trust Scotland (2867): Proposal BUR 001 is adjacent to an area of ancient woodland. Object to development on this site as it would lead to loss or damage to ancient woodland and recommend that the site is not allocated unless the protection of the adjacent woodland can be guaranteed. If the site is to be identified for development an appropriate buffer between the proposed development and woodland should be identified in the development requirements. Recommend that appropriate survey work is carried out if protected species are present on site or adjacent to the site.

BUR 003 Land at Haugh Road

Frances Provan (16): This site is common good land. More detail should be provided showing the location of the houses and the access road.

Ron Edwards (24), Inchcolm Land Ltd (1166), Geoff Lee (1538), LRH Enterprises Ltd (2002): Question the effectiveness of proposal BUR 003 (1166, 2002) and the suitability of the site for housing (1538) or housing at the density proposed (24). The following issues were raised:

- Archaeological remains on the site (24, 1538);
- Steepness of the site and rock close to the surface would make development expensive and difficult (1166, 1538);
- Loss of greenspace/greenfield site (2002, 1538);
- Lack of progress in taking the site forward (1166);
- The need for further flood risk investigation (2002).
The following alternative uses/designations were proposed for the site:

- a heritage park with links to the coastal path and some low density, high value housing (24);
- retain its ‘protected open space’ designation (1166);
- a community woodland, small community farm, or other outdoor project which preserve the archaeological features of the site (1538).

Inchcolm Land Ltd (1166): Given the housing land shortfall Proposal BUR 003 should be replaced by land at Seamill (Candidate Site BUR 005) which is effective for 60 units.

BUR 004 Former cinema site, High Street

LRH Enterprises Ltd (2005): This site has been vacant for some time. Question whether it will become effective within the plan period.

BUR 005 Grange Distillery

LRH Enterprises Ltd (2007): This site has been undeveloped for some time; its continued allocation appears to be linked to aspirations for the restoration of the distillery building. The development is unlikely to contribute to the SESplan requirement for the plan period.

Scottish Environment Protection Agency (3310): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site.

BUR 008 Roundhouse, North of Lammerlaws Road

SEPA (3311): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site.

BUR 009 South of Lammerlaws Road

SEPA (3312): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site.

BUR 010 Railway Sidings

SEPA (3313): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site.

KINGHORN

KNH 001 Lochside

Murray Begg (57): Due to the scale of development proposed to the north side of the road and the leisure attraction of Kinghorn Loch pedestrian access and routes need careful consideration in particular traffic calming measures and crossings over the busy road (two crossings are considered essential).

Ron Edwards (719): The capacity indicated for this site should not be exceeded; development should be a maximum of 2 storeys height and be designed to be
appropriate to its setting. A zebra or controlled crossing should be installed along the Loch Road.

SEPA (3539): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site and the requirement for a buffer strip along the watercourse to help protect and improve the water environment.

**KNH 002 Viewforth Place**

Blackmores (D) Ltd (143): Support the designation of KNH 002 as a housing opportunity site but challenge the capacity indicated for the site (18 units). 18 units this is considered an appropriate density for houses; however the site had planning permission granted (subject to completion of a legal agreement) in 2008 in for 31 apartments. The estimated capacity should reflect both either potential scenario (36 apartments or 18 houses).

**KNH 003 East of Kinghorn Loch**

Ron Edwards (720): Any building associated with the cemetery proposals should be restricted to particular locations at least 20m away from the lochside, should be low profile and designed to respect the natural and historical setting. No other buildings should be allowed.

SEPA (3542): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site and the requirement for a buffer strip along the watercourse to help protect and improve the water environment.

**KNH 004 East of Kinghorn Loch**

Ron Edwards (721): Any building associated with the cemetery proposals should be restricted to particular locations at least 20m away from the lochside, should be low profile and designed to respect the natural and historical setting. No other buildings should be allowed.

SEPA (3543): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site and the requirement for a buffer strip along the watercourse to help protect and improve the water environment.

**KIRKCALDY & DYSART**

Kirkcaldy and Dysart Issues

Kirkcaldy West Community Council (210): The Community Council supports the focus being given to brownfield sites within Kirkcaldy in FIFEplan.

Mansell Homes (1156): There are significant issues with the land supply in the Kirkcaldy, Glenrothes and Central Fife Housing Market Area. The area contains a number of Strategic Development Areas and other constrained sites which are not delivering the required level of development required in order to meet SESplan requirements. FIFEplan needs to be flexible in the allocation and scale of new development sites in order to support the delivery strategy.

The proposed FIFEplan originally identified candidate site LDP-KDY003 Chapel Home
Farm, Kirkcaldy for housing however the site was removed by Executive Committee (September 2014) in order to retain the green wedge between the town and the A92. The deletion of the site cannot be justified for the following reasons: The site is effective and could be developed early in the plan period; it is close to a range of commercial and employment facilities and accessible to public transport making this a sustainable location which would provide greater housing choice in Kirkcaldy; landscaping proposals can address the visual/physical separation concerns and the development would improve a partially brownfield site improving the appearance of Kirkcaldy from the A92; development on this site would not undermine the delivery of the Strategic Development Areas or other allocations; assessments have shown there are no known constraints to the sites development; and the two points of access required can be provided.

In the Mid Fife Local Plan examination the reporter found “that the development of the site would generally meet the underlying objectives of the structure plan in the context of the wider Fife settlements, and would not have a significant adverse effect on the landscape setting of the north western edge of Kirkcaldy”. However they were not convinced that suitable vehicular access could be provided, as this issue has now been addressed there is no reason why this site should not be allocated for residential development.

Raith Developments Limited (1361): Object to the non-allocation of candidate site LDP-KDY001 for housing with a total capacity of 500 units. There is a significant shortfall in housing identified in this plan and the two Kirkcaldy Strategic Land Allocations have questionable effectiveness and are unlikely to deliver the short term numbers anticipated for them.

Given the potential for further delay in the delivery of the currently allocated sites additional housing sites should be allocated to meet the identified requirement in full as required by Scottish Planning Policy. Candidate site LDP-KDY001 is effective and could deliver housing in the short term making up for other sites not coming forward. The site has a willing landowner; is free from constraints and contamination; does not require public subsidy to make it viable; is in a marketable area; does not have significant infrastructure requirements and is in a preferred residential area.

Forth Ports Ltd (1752): The proposals map does not accurately reflect the industrialised nature of port operations at Kirkcaldy Harbour, the mapped area of safeguarded employment land needs to be amended. Forth Ports does not intend to release land within the port area for alternative uses, it is therefore inappropriate to indicate a Green Network Opportunity through operational land at the Port this would not be implementable and could interrupt the operation of the port and contravene bye-laws put in place to protect the health, safety and security of both operators and members of the public.

NHS Fife (3850): Housing allocations in the Kirkcaldy area (beyond KDY 025 and KDY 026) could impact on healthcare services, further discussions with NHS Fife are advised.

KDY 003 Chapel Extension, John Smith BP

Persimmon Homes (East Scotland) (1976): It is unclear if the capacity (285) shown for proposal KDY 003 is the remaining capacity or the total for the site. Need this clarity to determine the impact on the LDP Housing Supply.
KDY 004 Dunnikier Maltings

Persimmon Homes (East Scotland) (1978): It is unclear if the capacity (199) shown for proposal KDY 004 is the remaining capacity or the total for the site. Need this clarity to determine the impact on the LDP Housing Supply.

KDY 005 Ferrard Road

Persimmon Homes (East Scotland) (1979): It is unclear if the capacity (119) shown for proposal KDY 005 is the remaining capacity or the total for the site. Need this clarity to determine the impact on the LDP Housing Supply.

KDY 010 Forth Park Hospital

NHS Fife (3851): Planning permission for this site has lapsed. Potential planning options for the site are being considered.

KDY 014 Hayfield Road

SEPA (3255): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site.

The environmental report has identified a negative effect on a corner of the site relating to the Hazardous Site Consultation Zone for the Smeaton Complex; it is unclear what mitigation has been proposed regarding this. The environmental report also proposes the requirement for a Site Specific Risk Assessment as part of any application to address potential contamination issues as the site is within the Coal Authority Consultation Zone. These mitigation measures are not included in the development requirements for Proposal KDY 014.

KDY 015 Smeaton Road

Forbo Flooring UK Ltd (936): Support the requirement for a buffer zone between the housing and adjacent commercial uses in order to protect both residential amenity and existing business operations.

SEPA (3481): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site.

KDY 017 Factory Road/Nairn Street

Scottish Enterprise (1055): Support the allocation of Proposal KDY 017 and the preferred uses identified for the site.

Forbo Flooring UK Ltd (925): Object to the identification of housing as a potential use for Proposal KDY 017. The Forbo Flooring UK Ltd linoleum factory is located near to this site and there are concerns it would be considered a bad neighbour due to noise and odours created as part of the factory’s day to day operations. The proposed new housing site could potentially prohibit any future expansion of the factory’s operations. This in turn could have an impact upon the local economy of Kirkcaldy.

The commitment in the development requirements to work with key stakeholders in
order to facilitate appropriate development at this location is welcomed.

KDY 018 Den Road Former Tramworks Site

SEPA (3482): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site.

KDY 019 Victoria Fields

Miller King Kirkcaldy Ltd (967): Object to the allocation of Proposal KDY 019 as an employment opportunity and in particular references to uses associated with the hospital. The site has been previously offered to the hospital who purchased some land for parking but rejected the opportunity to safeguard the land for their use longer term.

In Fife Council’s consultation on the development strategy in Feb 2014 the site (candidate site LDP-KDY005) was identified as a ‘preferred housing site’ (see SD1 LDP-KDY 005 site assessment October 2013), in addition the response to a pre-application enquiry in Feb 2014 was positive for residential use. The site is within the area covered by the Kirkcaldy Charrette (held Feb 2014) and the consultee took part in charrette discussions where the proposed use for the site was residential. There have been no subsequent discussions regarding the proposed employment uses and there has been no interest from potential occupiers for employment uses. The site has failed to deliver effective employment land for a number of years.

This is an effective, brownfield site capable of delivering housing in the short term; and given that the housing land supply in Fife is severely constrained the site should be allocated as a residential opportunity site. The consultee is in discussion with the Health and Safety Executive regarding the historic hazard consultation zoning.

SEPA (3483): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site.

KDY 020 Dunnikier Business Park

The Woodland Trust Scotland (2904): Proposal KDY 020 is adjacent to an area of ancient woodland. Object to development on this site as it would lead to loss or damage to ancient woodland and recommend that the site is not allocated unless the protection of the adjacent woodland can be guaranteed. If the site is to be identified for development an appropriate buffer between the proposed development and woodland should be identified in the development requirements. Recommend that appropriate survey work is carried out if protected species are present on site or adjacent to the site.

SEPA (3484): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site and the requirement for a buffer strip along the watercourse to help protect and improve the water environment.

KDY 022 Wheatfield Road *

The Woodland Trust Scotland (2912): Proposal KDY 022 is adjacent to an area of ancient woodland. Object to development on this site as it would lead to loss or damage to ancient woodland and recommend that the site is not allocated unless the protection of the adjacent woodland can be guaranteed. If the site is to be identified for
development an appropriate buffer between the proposed development and woodland should be identified in the development requirements. Recommend that appropriate survey work is carried out if protected species are present on site or adjacent to the site.

*Note: the original representation refers to Proposal KDY 021 but it has been confirmed by The Woodland Trust Scotland that it should refer to proposal KDY 022 (see SD2).

SEPA (3487): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site and the requirement for a buffer strip along the watercourse to help protect and improve the water environment.

KDY 024 Smeaton Road

SEPA (3489): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site.

KDY 025 Kirkcaldy East

The Rosslyn Trust (1743): Support the continued identification of proposal KDY 025. The consultee has been actively seeking a partner to help facilitate development on their land.

SEPA (3490): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site and the requirement for a buffer strip along the watercourse to help protect and improve the water environment.

NHS Fife (3852): The proposed 2850 houses will impact on healthcare services. NHS Fife and Fife Council have discussed aspects of future developments and healthcare delivery. Further discussions with NHS Fife are advised. It is understood that NHS Fife relinquished the land allocation in Mid Fife Local Plan 2012 to accommodate a Fife Council request for land. Land for health care facility was to be re-allocated in alternative location. Confirmation of this change needs to be included in FIFEplan.

KDY 026 Kirkcaldy South West

Ron Edwards (26): Support the FIFEplan position on proposal KDY 026. The developer’s proposal to extend Kirkcaldy South West Strategic Development area (Candidate site LDP-KDY002) would create an unacceptable level of environmental and amenity damage (loss of prime agricultural land and impact on high quality landscape). This proposed extension has already been turned down by a Planning Inquiry.

Linsey Barclay-Smith (365): would object to any extension to the Kirkcaldy South West Strategic Development Area, there is no justification for this extension and its sustainability is questionable. Particular concerns are: road safety issues; pollution hazards; a failure to take into account what might be required to regenerate Kirkcaldy Town Centre; the lack of concern to preserve the character and amenity of Kinghorn and the landscape of Kirkcaldy; and the apparent push for what is best for the developers in terms of the cost of the development. The potential to significantly increase the density of Proposal KDY 026 highlighted by the developers “without sacrificing open space” is not supported by any evidence, the protection offered to the SSSI site would be of particular concern along with the questionable quality of the environment they are proposing to create.
The case for an additional greenfield land release made by Ryden is selective, misleading and lacks substantive evidence to support it. The submission made by Kingdom Housing (to the previous consultation on the Development Strategy) echoes these unsubstantiated arguments (see SD3 Kingdom Housing Asso rep Feb 2014, 5th paragraph).

Proposal KDY 026 already proposes that considerable swaths of pristine farmland and rural environment be given over to housing development. If this proposal were extended there would be adverse impacts on local (and protected) wildlife and the amenity and surroundings of the b-listed Pitteadie Castle and park wall.

Ron Barclay-Smith (376): would object to any extension to the Kirkcaldy South West Strategic Development Area, there is no justification for this extension and its sustainability is questionable. The potential to significantly increase the density of Proposal KDY 026 highlighted by the developers “without sacrificing open space” is not supported by any evidence and the protection offered to the SSSI site would be of particular concern.

The case for an additional greenfield land release made by Ryden is selective, misleading and lacks substantive evidence to support it. The submission by Kingdom Housing echoes these unsubstantiated arguments.

Proposal KDY 026 already proposes that considerable swaths of pristine farmland and rural environment be given over to housing development. If this proposal were extended there would be adverse impacts on local (and protected) wildlife and the amenity and surroundings of the b-listed Pitteadie Castle and park wall.

A K L McDonald (835): would object to any extension to the Kirkcaldy South West Strategic Development Area.

Particular concerns are: the impact of more housing on the safety of the already dangerous B9157; loss of prime agricultural land; adverse impacts on wildlife; the potential for further development to reduce the chances of regeneration of the centre of Kirkcaldy.

The consultee disagrees with the arguments put forward by the Ryden to support an extension of KDY 026. Further investment in the redevelopment of brownfield sites within Kirkcaldy should be prioritised before additional greenfield releases.

CALA Management Ltd (1677): It has always been the intention that the strategic development at Kirkcaldy South West is developed in 2 stages, the second stage being the proposed expansion to Proposal KDY 026. This larger scale development would have economies of scale that would allow infrastructure to be funded (the existing capacity of 1,000 houses is currently impacting on the delivery of infrastructure and therefore housing). Promotion of the wider development area has consistently been the consultees position and The Fife Structure Plan 2006-2026 acknowledged that the site was capable of growing beyond the structure plan period. An as yet undetermined PPP submitted in September 2010 showed how the expansion area could relate in landscape, ecology, infrastructure and urban design terms and all technical information produced for the Kirkcaldy South West area includes the expansion area. Separate to the issue of the expansion area there is some support from the planning authority for flexibility over the capacity of Proposal KDY 026 up to a maximum of 1,200 homes.

In the examination of the Mid Fife Local Plan the reporter did not have concerns about
the landscape impact of development in the proposed extension (as this land is in a less conspicuous part of the site) and was satisfied with the masterplan’s western boundary. The reporter concluded that the possibility of extending the development at Kirkcaldy South West should be considered through the next review of the Local Plan.

FIFEplan does not identify a sufficient housing land supply; expanding an existing SDA is the most effective way of providing the additional 1,950 homes outwith the Ore/Upper Leven Valley and North Dunfermline Strategic Development Areas identified in the SESplan SG. The loss of housing numbers as a result of sites being removed at Executive Committee on 9th September is also a consideration. Fife Council should focus on supporting deliverable sites, rather than allocating sites in less marketable locations. The expansion of proposal KDY 026 for an additional 600 houses raises no planning issues and is supported by the local community. The development as a whole should be prioritised as it will bring significant wider benefits for Kirkcaldy.

Some of the conclusions of the site assessments and scoring in the Environmental Report are challenged. Kirkcaldy South West is effective and will deliver housing throughout the FIFEPlan period as well as contributing to the land supply in the longer-term.

Kirkcaldy West Community Council (3864): The Community Council would object to any extension to the Kirkcaldy South West Strategic Development Area. Proposal KDY 026 is more than adequate to meet future need. Any expansion would lead to the loss of valuable greenspace.

SEPA (3492): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site and that any application must demonstrate that the development will not adversely affect the integrity of the Firth of Forth Special Protection Area either alone or in combination with other plans or projects.

Jean Cochrane (3753): The consultee would object to any extension to the Kirkcaldy South West Strategic Development Area, and disagrees with the arguments put forward by Ryden to support a further extension of Proposal KDY 026. Development on the land would lead to a loss of prime agricultural land, have an adverse impact on local wildlife and lead to a potentially dangerous increase in traffic. The redevelopment of brownfield sites within Kirkcaldy should be prioritised before additional greenfield land is identified.

NHS Fife (3853): The proposed 1000 houses could impact on healthcare services; further discussions with NHS Fife are advised.

KDY 029 Victoria Road, Former Power Station

United Investments Co Ltd (3719): Reference to the Category B listed former power station should be amended in FIFEplan to reflect the most recent decision of Fife Council (20 August 2014); that the Category B listed former power station can be demolished so long as construction contracts have been entered into for a replacement development on the site.

KDY 031 Charlotte Street

SEPA (3493): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site.
KDY 032 YWCA and Former Cinema

SEPA (3494): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site.

KDY 034 Thistle Street Car Parks

Lassalle Investment Management Ltd (2104): Generally support Proposal KDY 034 but the development requirements should include the potential for a flexible range of uses appropriate to town centres as set out in policy 6. In particular, Class 7 and Sui Generis Uses should be permitted as suitable within core retail areas.

SEPA (3497): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site.

KDY 035 Former Swimming Pool Site

Lassalle Investment Management Ltd (2106): Generally support Proposal KDY 035 but the development requirements should include the potential for a flexible range of uses appropriate to town centres as set out in policy 6. In particular, Class 7 and Sui Generis Uses should be permitted as suitable within core retail areas.

SEPA (3498): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site.

KDY 038 Former Bus Painters Garage

Robert Stock and Co (2069): Object to the limited number of preferred uses identified for Proposal KDY 038 in the development requirements. Flexibility allowing convenience or comparison retail and hotels, restaurants or other catering facilities should be included to keep the regeneration opportunities for the area as wide as possible. The suitability of these types of uses would still need to be demonstrated to Fife Councils satisfaction at time of application.

SEPA (3499): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site and the requirement for a buffer strip along the watercourse to help protect and improve the water environment.

KDY 039 Invertiel

SEPA (3500): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site.

KDY 043 John Smith Business Park, Chapel

SEPA (3501): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site.

KDY 044 Nairn Street

Forbo Flooring UK Ltd (935): Support the position that residential development is not identified as a suitable use on Proposal KDY 044. The consultee would encourage
careful consideration of the type and scale of development for this site, to ensure that their current and future operations are not adversely affected.

SEPA (3502): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site.

KDY 046 A92 Route Strategy Improvements

SEPA (3503): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site and the requirement for a buffer strip along the watercourse to help protect and improve the water environment.

COUNTRYSIDE AREA

LWD 002 Begg Farm

Diageo (Scotland) Ltd (1149): Support the allocation of employment land at site LWD 002, identified within the Proposed FIFEplan. We do have concerns however regarding the boundary of this allocation and that it should be amended to reflect the actual operation boundary of the bonded warehouse site.

Also suggest that the wider area surrounding the above site should not be identified as part of the proposed green network.

SEPA (3559): Support the conditions set out in the Development Requirements, including high quality SUDS.

Modifications sought by those submitting representations:

BURNTISLAND

Burntisland Issues


Inchcolm Land Ltd (1160): Mid Fife Local Plan Proposal BUR13 for a care home and associated facilities should be retained in FIFEplan.

Inchcolm Land Ltd (1162): Allocation of land (Candidate Site LDP-BUR005) at Seamill, Burntisland as a residential allocation of circa 60 units.

Forth Ports Ltd (1722): A modification is required to the boundary of the land safeguarded for port use to correctly reflect the operational land of the Port of Burntisland.

Cllr George Kay (758): Allocate additional sites in Burntisland.

BUR 001 Alcan Site

Persimmon Homes (East Scotland) (1966): Require clarification if the 96 capacity
indicated for proposal BUR 001 is the remaining capacity or a total for the site.

The Woodland Trust Scotland (2867): Delete proposal BUR 001 from the plan or identify an appropriate buffer between the proposed development and the area of ancient woodland in the development requirements.

BUR 003 Land at Haugh Road

Frances Provan (16): More detail should be provided showing the location of the houses and the access road.

Ron Edwards (24): The number of houses proposed for the site should be reduced. Part of the site should be identified as a heritage park linked to the history of the area.

Inchcolm Land Ltd (1166): Delete the housing site designation and retain previous ‘Protected Open Space’ designation.

Geoff Lee (1538): The site should be identified for a suitable outdoor use which preserves the archaeological remains.

KINGHORN

KNH 002 Viewforth Place

Blackmores (D) Ltd (143): The estimated capacity for proposal KNH 002 should be ‘36 apartments or 18 flats’.

KIRKCALDY & DYSART

Kirkcaldy and Dysart Issues

Mansell Homes (1156): Allocation of candidate site LDP-KDY003 for residential development.

Raith Developments Limited (1361): Allocation of candidate site LDP-KDY001 for residential development.

Forth Ports Ltd (1752): Amend boundary of safeguarded employment area to cover extent of operational area of Kirkcaldy Harbour. Redirect the Green Network Opportunity arrow away from operational port land.

KDY 003 Chapel Extension, John Smith BP

Persimmon Homes (East Scotland) (1976): Require clarification if the 285 capacity indicated for proposal KDY 003 is the remaining capacity or a total for the site.

KDY 004 Dunnikier Maltings

Persimmon Homes (East Scotland) (1978): Require clarification if the 199 capacity indicated for proposal KDY 004 is the remaining capacity or a total for the site.
KDY 005 Ferrard Road

Persimmon Homes (East Scotland) (1979): Require clarification if the 119 capacity indicated for proposal KDY 005 is the remaining capacity or a total for the site.

KDY 014 Hayfield Road

SEPA (3255): Mitigation measures identified in the environmental report should be included in the development requirements for Proposal KDY 014.

KDY 017 Factory Road/Nairn Street

Forbo Flooring UK Ltd (925): Residential use should not be included as a preferred use for Proposal KDY 017.

KDY 019 Victoria Fields

Miller King Kirkcaldy Ltd (967): Amend designation of proposal KDY 019 to a housing site rather than an employment site.

KDY 020 Dunnikier Business Park

The Woodland Trust Scotland (2904): Delete proposal KDY 020 from the plan or identify an appropriate buffer between the proposed development and the area of ancient woodland in the development requirements.

KDY 022 Wheatfield Road

The Woodland Trust Scotland (2912): Delete proposal KDY 022 from the plan or identify an appropriate buffer between the proposed development and the area of ancient woodland in the development requirements.

KDY 025 Kirkcaldy East

NHS Fife (3852): Identify land for a health care facility to replace the one previously identified in the Mid Fife Local Plan.

KDY 026 Kirkcaldy South West

CALA Management Ltd (1677): Expand the allocation of Proposal KDY 026 to include the land to the west (Candidate site LDP-KDY002) for an additional 600 houses.

KDY 029 Victoria Road, Former Power Station

United Investments Co Ltd (3719): Reference to the Category B listed former power station should be amended to read “the Category B listed former power station can be demolished so long as construction contracts have been entered into for a replacement development on the site”.

KDY 034 Thistle Street Car Parks

Lassalle Investment Management Ltd (2014): The development requirements should
include the potential for a flexible range of uses appropriate to town centres (including Class 7 and Sui Generis Uses) as set out in policy 6.

KDY 035 Former Swimming Pool Site

Lassalle Investment Management Ltd (2016): The development requirements should include the potential for a flexible range of uses appropriate to town centres (including Class 7 and Sui Generis Uses) as set out in policy 6.

KDY 038 Former Bus Painters Garage

Robert Stock and Co (2069): The development requirements should be flexible to allow for convenience or comparison retail and hotels, restaurants or other catering facilities if these uses can be demonstrated as appropriate to Fife Councils satisfaction.

COUNTRYSIDE AREA

LWD 002 Begg Farm

Diageo (Scotland) Ltd (1149): Amend the boundary of the site to reflect the actual operation boundary of the bonded warehouse site and remove the green network designation around the site.

Summary of responses (including reasons) by planning authority:

BURNTISLAND

Burntisland Issues

Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with under the Issue 2b Homes Schedule 4 and its associated supporting paper.

An intent of the Fife Structure Plan (2006-2026) and the subsequent Mid Fife Plan was to focus on redeveloping the dockland area at Burntisland (see CD6 page 22 and CD 5 paragraphs 1.32 and 1.33 page18). To highlight the key role this proposal had as part of the Local Plan strategy it was given the status of being a Strategic Land Allocation. The situation has now changed and this land is not available for mixed use development, with the focus now being on employment uses. This is reflected in FIFEplan. With the removal of the option to develop the dockland area the need for a Strategic Land Allocation designation in Burntisland also becomes unnecessary. The key element of the strategy was to redevelop the dockland area, not simply to have development in Burntisland.

SESplan does not direct the LDP to identify strategic scale housing in Burntisland. Housing figures are not calculated at individual town levels so there is no technical evidence pointing to the need to identify housing sites in Burntisland. Therefore, there is no policy need to identify housing in the town. The suitability of identifying housing in the town to meet the Dunfermline and West Fife Housing Market Area requirement was a matter for the site assessment process. The sites promoted through the LDP process are not suitable for housing development and are therefore not included in FIFEplan.
As highlighted by LHR Developments Ltd (1995) the new Burntisland primary school provides additional capacity for the area. Capacity issues at Balwearie are being addressed on a Kirkcaldy wide basis. New development across Fife will have an impact on where pupils live and consequentially on the pressures placed upon the school estate. Where obligations are necessary to mitigate for additional impacts of development, this will take the form of direct school and nursery provision, or contributions towards the cost of creating new accommodation for increased pupil numbers within existing schools.

Fife Council considers that there is merit in identifying the correct area of land used as part of the operational port using the plans supplied by Forth Ports (1722) (see SD4 - the area shaded blue is the operational port) and invites the Reporter to make an appropriate recommendation on this matter.

Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision.

**BUR 001 Alcan Site**

The capacity of 96 shown for proposal BUR 001 reflects the number of houses granted planning permission on the site through application 07/01102/CFULL. The 2014 Housing Land Audit provides the up to date position with regards the phasing of housing numbers, the number of completed houses on this site and how many units are remaining (see CD11 page 45).

The programming of the site in the Fife Council Housing Land Audit 2014 indicates that the site should be completed by 2018. As the site already has planning permission and is under construction deletion of proposal BUR 001 or including additional mitigation measures is not an option.

**Effectiveness of Proposals BUR 003 (Land at Haugh Road), BUR 004 (Former cinema site, High Street) and BUR 005 (Grange Distillery)**

It is considered that all the sites allocated in the FIFEplan Local Development Plan will meet the tests of effectiveness as set out in Planning Advice Note 2/2010 Affordable Housing and Housing Land Audits (CD10 paragraph 55 page 17 and CD11). Proposal BUR 005 is designated as a housing opportunity site reflecting its non-effective status. The housing land supply calculation includes an allocation based on 15% of all sites identified as non-effective.

**BUR 003 Land at Haugh Road**

Proposal BUR 003 is on common good land, this means that Fife Council will consult the local community and report to elected members on the disposal of the land. The site has not yet been marketed but there are plans to do this in the near future. The development requirements for the proposal highlights the archaeological remains on the site and requires appropriate mitigation measures to be put in place.
Fife Council still considers that this site is appropriate for housing development however it is agreed that the capacity shown on this site is probably too high given the topography of the site and landscaping mitigation measures identified for the railway, the woodland to the south and the archaeological remains. Taking all of this into account, Fife Council considers that there may be some merit in reducing the capacity of the site to 20 units and invites the Reporter to make an appropriate recommendation on this matter.

Recent comments from the Scottish Environmental Protection Agency (see SD5 08 August 2014 Fife LDP - SEPA Finalised Spreadsheet worksheet ‘Flood Risk’ row 60) suggest that there may be flooding issues within the site which should be investigated further to ensure there is no increase in runoff to Haugh Road. Fife Council considers that there is merit in adding a requirement for a Flood Risk Assessment is added to the development requirements despite this not being a specific recommendation from Scottish Environment Protection Agency and invites the Reporter to make an appropriate recommendation on this matter.

Non-inclusion of sites

Candidate sites LDP-BUR 001, LDP-BUR 002 and LDP-BUR 003, Newbigging Farm sites 1, 2 & 3

The candidate sites were all assessed to establish the potential impact of development on the surrounding landscape. These three sites are all within a designated Local Landscape Area; this means that all these sites are considered to have value in landscape terms (contrary to the comments by LHR Enterprises (1995)). The landscape setting of candidate site LDP-BUR 001 was previously considered in the examination of the Mid Fife Local Plan (previous reference Newbigging farm candidate site BUR005) which concluded that:

‘It (development of the site) would have a significant adverse effect on the landscape setting of the western edge of the town… Even a smaller allocation of part of the land could not avoid having an adverse effect on the landscape setting of the western edge of the town.’ (see CD20 page 149)

Of these three sites it is considered that candidate site LDP-BUR 001 would have the most potential to be able to accommodate some small scale, carefully designed development. However, the level of development that could potentially be acceptable is considerably smaller than the scale of development that is being currently promoted for this site.

Therefore Fife Council considers that development or the scale of development proposed on these sites would have an unacceptable adverse impact on the Local Landscape Area and the setting of Burntisland when approached from the west.

Candidate site LDP-BUR 005, Seamill

This site was identified as an ‘Other Proposal’ BUR 13 and had the ‘protected open space’ designation removed in the Mid Fife Local Plan following a recommendation in the examination report for the plan (see CD20 page 150). This modification was made because planning permission had been granted for an 80 bed residential care home and associated care facilities on the site. This consent has now lapsed. More recently the site has been promoted for residential development (60-70 units) through the call for
sites process for FIFEplan. It is unclear exactly what use Inchcolm Land Ltd intend to pursue, they request that the adopted Mid Fife Local Plan designation should remain as they now have operator interest in running a care home on the site (1160). At the same time they are looking to get an allocation for a residential development of 60 units on the site (1162).

When the planning consent was granted for the care home it was argued that ‘the benefits the development would bring to the community in terms of the health and dental aspect would outweigh the loss of a portion of open space’ (see SD6 07/04084/COPP committee report page 3 paragraph 3.1). This same community benefit would not result from the development of the site for housing. In addition since the original planning application was granted there has been some loss of protected open space within Burntisland as a result of the development of the new Primary School. Further loss of greenspace within the town is not desirable.

Inchcolm Land Ltd (1162) claim that this site is free from constraints and that the previous use has not resulted in contamination of the land: This is not correct; there are considerable contamination issues on the site relating to its previous use as a landfill site associated with the Alcan aluminium processing works. The site assessment for LDP-BUR 005 concluded that ‘Further investigation of the contamination on this site will be required to determine the remedial action and building design needed to make use of this site. The poor ground conditions on the site mean that considerable piling will be required to support any new buildings on the site.’ (see CD15 part 1 page 102). There is also an access issue as the site will require land outwith the red line boundary of the site in order to gain access.

Fife Council considers that due to the lack of clarity over the end use of this site, the loss of open space and the contamination and access constraints the most suitable designation for this site is as protected open space.

**KINGHORN**

**KNH 001 Lochside**

The development requirements for proposal KNH 001 include a requirement for a pedestrian crossing over the B923. More detailed consideration of traffic safety issues will be undertaken through the planning application process. The form of the development including building heights and a final number of houses will also be considered at that time. It is not considered that any additional text needs to be included within FIFEplan on these issues.

**KNH 002 Viewforth Place**

Blackmores (D) Ltd (143) refers to planning permission having been granted for 31 apartments on this site (subject to completion of a legal agreement). This application was withdrawn in November 2012, so this permission has not in fact been granted for the site. However planning permission was granted for 24 flats in 2000 (which has now lapsed). It is considered that while the estimated capacity could include a figure for flatted development the proposed figure of 36 units seems excessive and untested. Taking all of this into account, Fife Council considers that there is merit in adding text to the development requirements to indicate that a higher capacity could be accommodated on the site if it was developed for flats; leaving it for the planning
application process to determine the number of units that could be suitably accommodated on the site and invites the Reporter to make an appropriate recommendation on this matter.

**KNH 003 & KNH 004 East of Kinghorn Loch**

The design of any buildings associated with the proposed cemetery will be considered in detail as part of the planning application process. It is not considered that any additional text needs to be included within FIFEplan on this issue.

Ron Edwards (720, 721) suggests that there should be a 20m buffer between the edge of the loch and any buildings associated with the cemetery. The text in the development requirements was taken from text provided by the Scottish Environment Protection Agency regarding good practice relating to buffer strips (see SD7 SEPA response 08/08/2014 page 18 paragraph 3.5) and they have supported the text that was included in the development requirements (3542, 3543). However, this text does not entirely reflect the specific advice provided by the Scottish Environment Protection Agency on proposals KNH003 and KNH004 which recommends a minimum 6-12m buffer (see SD8 SEPA response spreadsheet Aug 2014 worksheet ‘water env and co-location’ row 396), and the text ‘either side of the watercourse’ and ‘as measured from the top of the bank’ is not really appropriate to this site where the proposal is on the side of a loch. Taking all of this into account, Fife Council considers that there is merit in revising this text to read ‘A buffer strip is required along the edge of the loch. The buffer strip should be a minimum of 6-12m wide’ and invites the Reporter to make an appropriate recommendation on this matter.

**KIRKCALDY & DYSART**

Kirkcaldy and Dysart Issues

Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision.

Kirkcaldy Harbour

The green network opportunity shown to the north of the harbour relates to improving access links north into the Kirkcaldy Dens area. The line and arrow head drawn for this opportunity is slightly long and so appears to enter the employment site. This is not intentional; the proposed connection is to the High Street not into the operational harbour (see SD9 - Extract of online mapping Kirkcaldy Harbour).

Fife Council considers that there is merit in identifying the correct area of land used as part of the operational land at the harbour using the plan supplied by Forth Ports (1752) (see SD10) and in reducing the length of the green network opportunity so that it does not enter the employment site and invites the Reporter to make an appropriate recommendation on this matter.
Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision.

**KDY 003 (Chapel Extension, John Smith BP), KDY 004 (Dunnikier Maltings) & KDY 005 (Ferrard Road)**

The 2014 Housing Land Audit provides the up to date position with regards the phasing of housing numbers, the number of completed houses on these sites and how many units are remaining (see CD11 page 49).

More detail on the provision of an effective housing land supply are dealt with under the Issue 2b Homes Schedule 4 and its associated supporting paper.

**KDY 014 Hayfield Road**

A small part of Proposal KDY 014 lies within the outer Hazardous Site Consultation Zone for the Smeaton Complex (see CD16 (SEA Annex 5 page 8) and SD11 (plan showing the hazard)). The Hazard that this consultation zone relates to has been demolished and it is understood that the owners of the land are in discussions to get the hazardous designation removed (see Miller King Kirkcaldy Ltd representation FIFEplan_PP_967). The Environmental Report (CD16) does not identify any mitigation measures relating to this hazard and it is considered that the Health and Safety Executives PADHI guidance would address this issue as part of future planning applications should the consultation zone still be in place at the time.

Potential contaminated land issues were identified in the site assessment for this site; the Environmental Report (CD16, Annex 5 page 8) identifies a requirement for a Site Specific Risk Assessment as a mitigation measure. As the Scottish Environment Protection Agency (3255) highlights this requirement has not been reflected in the development requirements for proposal KDY 014 in FIFEplan. Fife council considers there is merit in including the requirement for a Site Specific Risk Assessment in proposal KDY 014 and invites the Reporter to make an appropriate recommendation on this matter.

**KDY 015 (Smeaton Road) & KDY 017 (Factory Road/Nairn Street)**

Fife Council is aware of the potential conflict between existing and proposed industrial/employment uses and more sensitive land uses such as housing. The proposed FIFEplan identifies a green buffer strip between housing site Proposal KDY 015 and employment site KDY 024 which will separate the housing on Proposal KDY 015 from the existing Forbo Flooring UK operations along Den Road to ensure that this is not an issue in the future. Forbo Flooring UK have been consulted in the past regarding what would constitute an appropriate buffer around their operations but no definitive distance has been forthcoming. Fife Council will be happy to work with Forbo Flooring UK and other stakeholders in the area to ensure that any development in this area is appropriate to its location and does not have adverse impacts on existing operations.
**KDY 019 Victoria Fields**

The Kirkcaldy Charrette consultation report (see SD12 Victoria Rd Part 1 Consultation Report page 21) details the discussion held with Miller Developments during the charrette process. It records that the site was ‘recently acquired as part of a wider package of sites so no plans/decisions made as yet as to preferred land use.’ During the charrette three scenarios were investigated for the regeneration of the charrette area: Economically driven; Residentially led and Mixed Use. The inclusion of some residential use on part of the Victoria Fields site was investigated as part of these scenarios (see SD12 pages 24, 26 and 28) but the final recommendations of the charrette were that the site should be allocated for employment use (charrette ref VC17) for:

- Development site adjacent to the Victoria Hospital. Potential for hospital expansion and Medi-Park supply chain requirements and/or development to meet hospital servicing needs. Accessible from Smeaton Road. A Flood Risk Assessment must be undertaken prior to development on this site.
- Encourage contribution to re-establishing a foot/cycle connection along the site’s eastern edge to connect Smeaton Rd with Hayfield Rd. (see SD13 Victoria Rd part 2 Regeneration Strategy pages 30 and 35)

This recommendation was carried forward into the proposed FIFEplan and the site is identified as an allocated employment site in the Fife Employment Land Strategy (FELS) which was approved by Fife Council in 2014 (see CD18 technical report page 15).

**KDY 020 (Dunnikier Business Park) & KDY 022 (Wheatfield Road)**

The development requirements for these sites do not refer to the areas of woodland adjacent to the site although Proposal KDY 020 does identify the requirement for a buffer strip (minimum of 6m wide) along the watercourse which lies between the area of ancient woodland and the site. Therefore there will be a buffer strip provided between any development and the woodland to the south of KDY 020. The development requirements for proposals KDY 020 & KDY 022 could be amended to add a requirement for a buffer strip adjacent to the woodland as requested by The Woodland Trust Scotland (2904 & 2912). The requirement for more detailed survey work on protected species will be determined as part of any planning application process.

**KDY 025 Kirkcaldy East**

Proposal KDY 025 does not specifically refer to the requirement for healthcare facilities to be provided as part of the development however there is a requirement for community facilities that could include healthcare facilities. It is considered that there is no need to specifically reference provision of healthcare facilities within the development requirement text for proposal KDY025 as this is covered under the requirement for community facilities.

The report on the planning application for affordable houses on Mid Fife Local Plan Proposal KDY 059 (the site allocated for healthcare facilities) 14/01955/FULL refers to an alternative site for healthcare facilities being identified through future masterplanning processes (see SD14 14/01955/FULL committee report paragraph 2.2.1 page 2).
There have been discussions with NHS Fife regarding alternative locations for a healthcare facility within proposal KDY 025 but as yet no specific site has been identified, it is therefore not possible to identify an alternative site in FIFEplan.

KDY 026 Kirkcaldy South West

The support for the FIFEplan position on Proposal KDY 026 by Kirkcaldy West Community Council (3864), Ron Edwards (26), Linsey Barclay-Smith (365), Ron Barclay-Smith (376), AKL McDonald (835) & Jean Cochrane (3753) is noted. The particular concerns raised should this proposal be extended are listed in the summaries above.

Candidate site LDP-KDY002 was considered as part of the Examination for the Mid Fife Local Plan as a proposed extension to Kirkcaldy South West Strategic Land Allocation. Cala Management Ltd (1677) claim that the Reporter ‘did not have concerns about the Stage 2 expansion on the basis of landscape impact’. In fact the Reporter concluded that ‘The extension would significantly extend the development westwards, further into the countryside, and it would therefore increase the adverse effect on the landscape setting of the southern edge of Kirkcaldy.

Even though development on the area of the proposed extension would have a limited additional overall landscape impact, it would still represent a further major incursion of development into the countryside and special landscape area.’ and suggested that ‘It would .. be more appropriate in my view to consider the possibility of including the proposed extension in the next review of the local plan, which will be a local development plan where all potential site options will be considered in the context of the strategic housing land requirement applying at that time.’ (see CD20 page 363 & 364)

The context for FIFEplan is that the SESplan strategy focuses future growth in Fife in North Dunfermline & the Ore /Upper Leven Valley rather than focusing additional allocations in Kirkcaldy, whilst the local strategy for Kirkcaldy in FIFEplan remains focussed on brownfield release and urban regeneration.

The site assessment for Candidate site LDP-KDY002 concluded that development on the site was not supported given the potential adverse landscape and environmental impacts, loss of prime agricultural land, poor integration with Kirkcaldy and poor access to local services (see CD15 part 7 page 37). In addition the current allocation has not met the programming for the site set out in the Mid Fife Local Plan and the application for Planning Permission in Principle has not yet been determined as agreement is still required on timescales for the provision of school and developer contributions for transport infrastructure. It is therefore considered unlikely that an expansion of Kirkcaldy South West would be developed within the lifetime of the LDP. It was therefore considered that this site should not be allocated for development in FIFEplan.

The Strategic Environmental Assessment is a means to judge the likely impacts of a public plan on the environment and to identify ways to minimise that effect, if it is significant. To assist in judging the impacts of the sites that have been put forward for consideration for the proposed local development plan, and their likely overall effects, a methodology that used a scoring mechanism has been used scoring the likely impact of a proposal against each theme. (+/-) where negative numbers indicate negative impacts and positive numbers indicate positive impacts.
The score has been weighted to give an indication of the likely significance of the anticipated impact (or where there was more than one impact against a theme) and the potential to mitigate any issues highlighted.

The resultant scores allow an overall assessment to be made of the likely significant environmental impacts of the proposed plan. Mitigations that can be made to proposals to minimise the environmental effect of proposals and minimise the overall impact of the proposed Local Development Plan are considered.

Site scoring has been used as a means of assessing the overall strategic impact of the proposed Local Development Plan rather than a comparison of sites. The selection of sites within the Proposed Plan has taken account of a range of factors including environmental impacts.

The specific issues that have been raised by Cala regarding the site assessment have been previously addressed in an email sent in October 2014 (see SD15).

KDY 029 Victoria Road, Former Power Station

Fife Council granted planning permission for the demolition of the B listed building and erection of a care home on this site (see SD16). However the associated application for Listed Building Consent for the demolition of the listed building has since been withdrawn (see SD17) following the referral of the application to Scottish Ministers (see SD18). It is therefore considered that the text in the development requirements which refers to the B listed building should remain unaltered.

KDY 034 (Thistle Street Car Parks) and KDY 035 (Former Swimming Pool Site)

Whilst preparing the Local Development Plan the Thistle Street Car park and Former Swimming pool sites were considered in detail through a review of development sites in and around town centres in Fife. The preferred uses identified for the proposal were as a result of this review but alternative uses would be considered (hence the use of the term ‘preferred’). Ultimately the uses on these sites would need to comply with the acceptable uses listed in FIFEplan Policy 6 Figure 6.5 (page 216). Lassalle Investment Management Ltd’s (2014, 2016) request for use class 7 and sui generis to be considered acceptable uses within core retail areas will be addressed in the Schedule 4 for Issue 2E on Town Centres.

KDY 038 Former Bus Painters Garage

The development requirements for this proposal include a list of preferred uses on the site. The fact that these are identified as ‘preferred’ uses implies that alternative uses may be considered for the site and provides a degree of flexibility over the final use. Any planning applications for the uses referred to by Robert Stock and Co (2069): convenience or comparison retail and hotels, restaurants or other catering facilities would be judged on the merits of the proposal and against the relevant policies in the plan. It is therefore considered that there is no need to revise the list of preferred uses within this proposal.

Non-inclusion of sites

Issues relating to the housing land requirement and the provision of an effective housing
land supply are dealt with under the Issue 2b Homes Schedule 4 and its associated supporting paper.

Candidate site LDP-KDY001 Land at Wester Bogie Road

Candidate site LDP-KDY001 is outwith a Strategic Development Area identified in SESplan. The site was deemed unsuitable for development by Reporters in the Kirkcaldy and Mid Fife Local Plan Examination because development would be likely to have a significant adverse effect on the landscape setting of the western edge of the town (see CD20 page 331). This position remains unchanged. Any development would also lead to loss of prime agricultural land and would have poor integration with adjacent housing. The focus in Kirkcaldy is to promote redevelopment of the significant areas of brownfield land within the town. FIFEplan identifies a number of housing sites in and around Kirkcaldy with a variety of scales and locations. It is therefore not considered necessary to identify any additional large scale allocations.

Candidate site LDP-KDY003 Chapel Home Farm

Fife Council’s Executive Committee at its meeting on 9th September 2014 resolved to delete candidate site LDP-KDY003 Chapel Home Farm from the Proposed Plan (see CD23 point 466 pages 8-9).

The site is remote from local services and has poor connectivity to adjacent housing.

COUNTRYSIDE AREA

LWD 002 Begg Farm

The boundary for this proposal is drawn tight around the bonded warehouses. The area that has been mapped is much smaller than the area given for the site in the countryside area proposals table (221.6 ha) which is also the area given in Fife Employment Land Strategy. The 221.6 ha figure relates to the whole area granted planning permission (ref 12/00981/FULL) and includes the proposed structural landscaping. Fife Council considers that there is merit in identifying the whole of the site granted planning permission as established employment land (see SD19) and invites the Reporter to make an appropriate recommendation on this matter.

The Indicative green network shown around proposal LWD 002 is taken directly from the landscape plan approved as part of planning permission (see SD20). The indicative green network designation does not imply that this land will require public access; it indicates that this new landscaping (when delivered) will form part of wider habitat and drainage networks in the area and that it will become an important visual landscape asset. The landscaping around this large development in the countryside was identified as an important factor in mitigating the impact of the proposal and it is therefore considered appropriate to identify the proposed structural landscaping as indicative green network in the LDP.
**Reporter's conclusions:**

**BURNTISLAND**

Requirement for additional housing land

1. Councillor George Kay argues that approximately 200 additional houses are required in order to sustain the Burntisland community. In the first instance it is necessary to consider housing in a wider context and take account of the strategic objectives of SESplan. This matter has been considered under Issue 2(b), Homes. In this respect, I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the effective housing land supply for the SESplan area of Fife. However, it is also necessary to acknowledge the uncertainties expressed with regard to the level of the shortfall.

2. Although Councillor Kay doubts the ability of certain designated sites to deliver houses, I assess those allocations below and conclude that they should not be deleted from the proposed plan. I accept that the estimated capacity of site BUR 004 appears to be high but do not have the evidence to make a detailed assessment of the potential. I have also considered the site known as “Red Mud Pond” (site LDP-BUR005) but conclude that this should not be allocated for housing. Finally, I have examined the possibility of extending the settlement boundary to the west to provide additional housing land but, once more, I have concluded that this would not be justified.

3. All-in-all, I conclude that, regardless of the level of housing shortfall, the adverse impacts of providing the additional housing proposed would outweigh the benefits of addressing any shortfall. Although Councillor Kay believes that there is a local need to sustain the community I have been provided with no evidence to support this contention. Whilst the allocated sites might provide development challenges I consider that they should be retained in the proposed plan and offer the potential for new houses within the town. In turn, I conclude the proposed plan should not be amended in response to this representation.

Candidate sites LDP-BUR001, LDP-BUR002 & LDP-BUR003 Newbigging Farm (sites 1, 2 & 3)

4. The three sites at Newbigging Farm lie to the west of the Burntisland settlement boundary. Immediately adjacent to the boundary, site LDP-BUR001 extends westwards to the north of the A921. At the time of my site inspection, the land was under pasture. It slopes gently upwards northwards from the road. Site LDP-BUR002 adjoins the western boundary of LDP-BUR001 and extends further to the west on the north side of the A921. Again this land slopes upwards from the road and was under pasture. Site LDP-BUR003 lies to the south side of the A921, opposite LDP-BUR002. This land slopes steeply downwards to the south and bounds the railway line at the foot of the slope beyond which is the foreshore of the Firth of Forth. The site is largely under pasture with an area of roadside woodland.

5. As indicated, the sites lie beyond the settlement boundary. They are within a designated local landscape area and I note the land is of prime agricultural quality.

6. As explained, in the first instance it is necessary to consider housing in a wider context and take account of the strategic objectives of SESplan. This matter has been
considered under Issue 2(b), Homes. In this respect, I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the effective housing land supply for the SESplan area of Fife. However, it is also necessary to acknowledge the uncertainties expressed with regard to the level of the shortfall.

7. LRH Enterprises objected to the non-allocation of all three sites at Newbigging Farm but recognises that sites LDP-BUR002 and LDP-BUR003 would involve a strategic scale of development inconsistent with SESplan spatial strategy. In turn, it is accepted by LRH Enterprises that these two sites cannot be considered under the FIFEplan strategy. On this basis, there is no further requirement to consider these two sites and I conclude that the proposed plan should remain unchanged in respect of sites LDP-BUR002 and LDP-BUR003.

8. The council argues that there is no policy support for the identification of further housing in Burntisland although LRH Enterprises believes that site LDP-BUR001 is effective and is capable of making a contribution at local level. It is claimed that such a non-strategic scale of development would be consistent with SESplan spatial strategy.

9. Notwithstanding this difference of opinion in terms of policy, I note the site was considered at the examination of the current local plan. The council explains that the examination report states that development at this location would have a significant adverse effect on the landscape setting of the western edge of the town. It was considered that even a smaller development would have an unacceptable impact. In response, LRH Enterprises draws attention to what is considered to be a poor quality approach to Burntisland from the west. Visually, the edge of the town is not believed to be attractive and the development of the site could bring about significant improvement to the landscape setting of the town. Such development, it is claimed, would not detract from the overall integrity of the local landscape area.

10. As I have previously concluded, allocated sites within the settlement boundary provide housing opportunities which, although challenging, provide the potential for development.

11. I accept that the western entrance to Burntisland is not of the highest quality in all respects although, nevertheless, it is contained within a local landscape area. The south side of the road offers a pleasant approach and the housing to the north provides a clear edge to the town. I do not think it necessary or justified to support a housing development on site LDP-BUR001 to secure the improvements envisaged by LRH Enterprises.

12. Although it has been claimed that the integrity of the local landscape area would be retained following development, the site has value within the landscape and is an important element in the setting of this part of Burntisland. Additionally, the prime agricultural quality of the land is to be taken into account. The council has explained that in some cases the loss of land of this quality has been inevitable but, in my opinion, in this instance, there is no overriding reason for the loss of the land to development.

13. In conclusion, regardless of the level of housing shortfall, I find that this site would nevertheless be unacceptable because the adverse impacts identified above would outweigh the benefits of addressing any shortfall. The proposed plan should remain unchanged in this respect.
Candidate site LDP-BUR 005 Seamill

14. The site, also known as “Red Mud Pond”, lies within a wider area of protected open space. Alternative land uses for the site have been suggested: (a) a residential care home and (b) residential development.

15. The land was first allocated as protected open space in the Kirkcaldy Area Local Plan 2003. In 2008, outline planning permission (as it was known then) was granted for a care home and associated care facilities. The council considered that the provision of these facilities justified setting aside the protected open space allocation. Development did not proceed and the Fife Greenspace Audit 2010 and the subsequent Fife Greenspace Strategy identified the area as amenity open space. Nevertheless, to reflect the planning permission, the Mid Fife Local Plan allocated the site as a development opportunity.

16. Despite a time extension, the outline planning permission lapsed with the development unimplemented. The proposed plan has reverted to allocating the land as protected open space. The council has explained that a primary school has been built on open space elsewhere in the town and so the loss of the site is no longer justified.

17. In further submissions, the council has provided details of changes in the open space provision in Burntisland since the audit was undertaken in 2010. The council believes that currently there are 4.7 hectares of usable greenspace in the town for each 1000 inhabitants. This would be reduced to 4.3 hectares should the site at Seamill be developed. Inchcolm Land Ltd disagrees with the council’s opinion. The Greenspace Audit indicates that Burntisland has a level of open space significantly higher than the average in Fife. The loss of some of this area to the new school and the reduction in the area at this site would still leave the town with a higher than average level of open space. Inchcolm Land Ltd therefore argues that the reduction of open space would not be significant in the wider context.

18. Whilst I note the opinions on the overall open space provision within the town, I believe the open space between the railway line to the north and the established housing to the south provides an important green wedge within the structure of Burntisland. Although the Greenspace Audit indicates the quality of the open space is not of a high standard, it is nevertheless considered to be worthy of protection. Longer-term improvements are proposed to enhance the value and appearance of the area. The loss of some of the wedge to development is the issue at stake. Guidance in Scottish Planning Policy indicates the need to protect open space identified in greenspace audits.

19. I agree with the assessments of the value of the site and consider that development would significantly impinge on the open space and bring about an adverse impact. Development would also appear as an enclave having little visual or physical linkage with the surrounding urban area. Overall, I conclude that development would not be to the benefit of the townscape of Burntisland.

20. On the basis of this conclusion I further conclude that the allocation of a site to construct some 60 houses would not be justified. In reaching this conclusion, I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the 5-year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under Issue 2b (Homes) with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that this site would nevertheless be
unacceptable because the adverse impacts identified above would outweigh the benefits of addressing any shortfall.

21. There is perhaps a stronger argument for the designation of a site for a care home and a range of community facilities reflecting the council’s decision to grant planning permission for a similar development in 2008. Clearly, the provision of the facilities referred to in the representation would be of community benefit but there is no compelling evidence that implementation is more likely at this time than previously. On the other hand, although the Greenspace Audit certainly suggests that the overall level of open space in the town would remain at a satisfactory level, the value of the open space, in itself, is such that its loss, even partially, would be significant. On balance therefore, I also conclude that the allocation of a care home proposal and community facilities should not be included at this location.

22. In reaching these conclusions I have also taken account of the contamination and access issues. I have noted the comments of Inchcolm Land Ltd in this respect and accept that the contamination issue could probably be resolved. It is clear that significant cost would be likely and no doubt this would require a judgement as to viability once full details were known. I also note the access situation and believe that this issue would be unlikely to represent an insurmountable constraint. Nevertheless, these matters do not lead me to alter my conclusions about the value of retaining the protected open space.

**Land safeguarded for port use**

23. The land allocated for employment purposes in the port vicinity, as indicated in the Inset Map for Burntisland, shows minor discrepancies from the ownership map (supporting document SD4) provided by Forth Ports Ltd. The ownership map depicts the correct boundary of the operational land of the Port of Burntisland and the Inset Map for Burntisland should be adjusted accordingly.

**Impact on health care facilities**

24. Discussions with NHS Fife regarding possible impact on healthcare services would no doubt be beneficial. However, such discussions can take place irrespective of whether they are mentioned in the plan. Accordingly, there is no requirement to alter the proposed plan.

**Site BUR 001 Alcan Site**

25. The development of this site is complete and therefore the protection of the adjacent woodland can no longer be achieved through the proposed plan.

26. The council confirms that planning permission was granted for 96 houses. Account will be taken of this total in the assessment of housing land supply.

27. No modification is required in respect of the allocation of this site.

**Site BUR 003 Land at Haugh Road**

28. I note the status of the site as “common good land”. It appears that such land is capable of disposal and therefore this is not a planning impediment to the allocation in
the proposed plan.

29. The site is north-facing and slopes relatively steeply. However, there is existing housing on the hillside to the east and west and, despite the topography of the site, I believe that development would be possible, albeit challenging. The constraints imposed by archaeological, flooding and access considerations would add to this challenge. Nevertheless, I have not been presented with evidence to suggest that these matters could not be overcome through careful design and mitigation measures. In this respect, the suggested reduction in capacity to 20 units and the requirement for a flood risk assessment would be of assistance in meeting the layout and design challenges.

30. I have noted the various suggested alternative uses, all of which require community involvement. In themselves, these uses have merit but I am not persuaded that justification has been demonstrated for any such use at this location. I therefore conclude the housing allocation should be retained subject to modifications in respect of site capacity and development requirements.

Site BUR 004 Former cinema site, High Street

31. Although effectiveness has been questioned there is no doubt that in townscape terms this is an important central site with a High Street frontage. Clearly, the site has remained vacant for some time but the proposed plan properly identifies the land as providing a development opportunity and indicates the potential for commercial development with housing above ground floor level. This is reasonable and there is no requirement for a modification in this respect.

32. The estimated capacity of 40 has been questioned and I accept that this does appear to be high for a site of this size. However, the site is within the town centre where higher density development is more likely to be acceptable. In any event, a future detailed proposal could be for a lower number of units. Development management would play an important role at the time such proposals come forward. In the meantime, as I have no clear evidence to lead me to recommend a lower estimated capacity, the proposed plan should remain unchanged.

Site BUR 005 Grange Distillery

33. The requirement to restore the distillery, a listed building, clearly presents a challenging development prospect for the site. Nevertheless, I believe the proposed plan is correct to stipulate this requirement, reflecting the guidance in Scottish Planning Policy that listed buildings should be protected from demolition.

34. In terms of the standard approach, the site is shown as being non-effective in the 2015 Housing Land Audit. On this basis, I believe that the proposed plan is justified in designating the site as a housing opportunity. I note the adjacent site is currently under development for housing. This might generate some interest in the subsequent development of the former distillery site. In any event, no modification is required in respect of site BUR 005.
KINGHORN

Site KNH 001 Lochside

35. I note the concerns expressed including those in respect of design, relationship with the surrounding land, especially Kinghorn Loch, and traffic. These matters are important and will be integral to the planning process when the site progresses towards development. Although the style of the proposed plan is to identify only basic development requirements, this does not prejudice the development management function of the council, including the application of Policy 1, Development Principles. An alteration to the succinct terms of site KNH 001 is therefore not required.

Site KNH 002 Viewforth Place

36. Flatted development has previously been granted planning permission on this site and it is not inconceivable that another development of this nature might be brought forward in the future. A well-designed flatted development would not be out of place in this central location and therefore it would be appropriate for the proposed plan to make a reference to this possibility. Although a capacity of 36 apartments has been suggested, I believe it would be preferable to retain the indicated estimated capacity of 18 whilst also referring to the potential for flatted development. Development management procedure would determine the number of units should a formal proposal be submitted for either houses or flats.

Sites KNH 003 & 004 East of Kinghorn Loch

37. The development of this site as a cemetery would involve sensitive considerations both in terms of the landscape setting, including the proximity to Kinghorn Loch, and the future use. I have no reason to believe that those ultimately responsible for the development of the site as a cemetery would not respect these matters and bring forward a proposal suited to its purpose in a semi-rural setting. However, in response to the Scottish Environment Protection Agency, the council has suggested the specification of a minimum requirement for the buffer strip and I agree that this should be included as a development requirement.

KIRKCALDY

Candidate site LDP-KDY 001 Wester Bogie Road

38. I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the 5-year effective housing land supply for the SESplan area of Fife within which this site falls. However, I also acknowledge the uncertainties expressed under Issue 2(b), Homes, with regard to the level of this shortfall.

39. In any event, irrespective of the level of shortfall in the 5-year effective housing land supply, it is necessary to consider the individual attributes of the site in order to assess whether or not it would be suitable for housing.

40. I note detailed technical assessments of the site have been undertaken in respect of land quality, geotechnical considerations, drainage, services and, more recently, transport. It has been argued that the site is effective and would be able to deliver new houses in the short term.
41. In my opinion, the over-riding consideration in assessing the suitability of the site for residential development relates to landscape character and visual impact. These matters are dealt with in the representation submitted by Raith Developments Limited. In particular, it is suggested that, over time, structural planting would reduce the landscape impact. In turn, it is argued, there would be no major long-term negative landscape effects. Planting and careful design would also, it is claimed, offset any visual impacts. Overall, the conclusion is that the development could be successfully integrated into the wider landscape setting.

42. Wester Bogie Road provides a very clear western edge to Kirkcaldy at this point. Development to the west of the road would be particularly prominent in terms of the landscape setting of the town, not only because of the breach in the firm edge to the town but also because of the relative elevation of the site. I therefore agree with the finding in the examination report for the Kirkcaldy and Mid Fife Local Plan that development on the site would have a significant adverse landscape impact on the western edge of the town. Housing would therefore not be an appropriate use and, in turn, the site fails the land use test of effectiveness.

43. On the foregoing basis, despite the technical assessments and regardless of the level of housing shortfall identified, I find that this site would nevertheless be unacceptable because the adverse impacts identified above would outweigh the benefits of addressing any shortfall. I do not consider that there is justification for the release of this land for residential development and therefore the site should not be included in the proposed plan.

Candidate site LDP-KDY 002, Extension of Kirkcaldy Southwest

44. Site KDY 026, Kirkcaldy South-West is a major town expansion allocation in the countryside to the south-west of Kirkcaldy. The site extends to 101.9 hectares with an estimated capacity of 1000 houses along with supporting services and facilities.

45. CALA Management Ltd argues that the expansion area has always been regarded as a two stage process with land for further potential growth to the immediate west of site KDY 026. The company has therefore proceeded on the basis that the initial expansion area (site KDY 026) would be designed in a manner to facilitate a future second phase. Master plan preparation has adopted this approach. Further, an application for planning permission in principle was made in 2010 also reflecting this concept. When the matter was considered at the examination of the current local plan, CALA believes the reporter had no concern about the impact of the proposal in terms of landscape impact. However, the reporter indicated it would be more appropriate to reconsider the proposal at the time of the review of the local plan (the currently proposed plan) in the context of strategic housing land supply.

46. In view of the claimed strategic shortage of housing land, CALA believes that the most effective way of ensuring additional residential development would be to enlarge the proposed town expansion area. This would make provision for an additional 600 units in the second stage of the development. Including flexibility, a total of 1800 houses in the two stages would justify the level of infrastructure investment that would be required and also improve the business case for the development. Indeed, argues CALA, there is a strong case for a development of this size in terms of the wider economic benefits that would be generated.
47. As has been explained elsewhere, I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the 5-year effective housing land supply for the SESplan area of Fife. However, I also acknowledge the uncertainties expressed under Issue 2(b), Homes, with regard to the level of this shortfall. In any case, no matter the level of shortfall in the 5-year effective housing land supply, I am conscious of the strategic focus on North Dunfermline and the Ore and Upper Leven Valley for new residential development.

48. As indicated by the council, the local strategy for Kirkcaldy remains focussed on brownfield release and urban regeneration. My visits to the area have demonstrated that this approach has borne some considerable success in Kirkcaldy and yet there is much scope for continuing regeneration. This work should not be undermined and, in this respect, I am mindful of the two major land allocations: Kirkcaldy South-West (1000 houses capacity) and site KDY 025, Kirkcaldy East, with an estimated capacity of 2850 houses. In this context, although I have noted the comments in respect of efficiencies of scale, I do not believe there is a sound basis for extending the allocated area of Kirkcaldy South-West as requested by CALA.

49. In reaching this conclusion I have also noted the terms of the examination report for the current local plan, particularly the following passage:

“In addition, even though development on the area of the proposed extension would have a limited additional overall landscape impact, it would still represent a further major incursion of development into the countryside and special landscape area. It would therefore be more appropriate in my view to consider the possibility of including the proposed extension in the next review of the local plan, which will be a local development plan where all potential site options will be considered in the context of the strategic housing land requirement applying at that time.”

50. I agree that in the context of allocated site KDY 026, the incremental landscape impact would be limited to some extent but, nevertheless, it is accurately described as a “further major incursion”. An incursion of this magnitude should not be contemplated unless there is overriding justification. As suggested in the previous report, it is appropriate to review the current strategic housing land requirement but, as explained, this does not point to the release of the site. Equally, the housing situation in Kirkcaldy, including the potential for urban regeneration, does not lead me to believe that the allocation of an expanded Kirkcaldy South-West is justified.

51. In conclusion, regardless of the level of housing shortfall, I find that this site would nevertheless be unacceptable because the adverse impacts identified above would outweigh the benefits of addressing any shortfall. There should be no modification to the proposed plan in this respect.

Candidate site LDP-KDY 003 Chapel Home Farm

52. This site had been included in the proposed plan but was deleted at an advanced stage in the preparation process. I believe this decision was justified. Although the site had been described as “urban infill” I do not consider this to be a correct description as there is agricultural land to the west and the A92 to the north. Urban development therefore bounds only the east and south sides of the site. Despite the proximity of a range of urban uses, the site is an edge-of-town location and is shown on the Kirkcaldy and Dysart Inset Map to be beyond the settlement boundary. Although I note that the
examination report for the Kirkcaldy and Mid Fife Local Plan regarded the potential development of the site to be “effectively infill”, for the reasons set out above, I do not believe this to be the case.

53. A consequence of the lack of infill status is that the site has little connectivity with the existing urban structure of Kirkcaldy. In particular, in respect of the adjacent houses to the south, development of the proposed site would have little relationship with the neighbouring residential area. This is recognised in the council’s assessment of the site.

54. I note that concern was previously expressed about the difficulty of providing a suitable access. This matter has now been addressed though a transport assessment which identifies the potential for providing two points of access. The primary access would be taken from the A921 using the existing access to the Chapel Home Farm complex. Secondary access would be achieved by the demolition of an existing building and the extension of Dean Park Way, currently a cul-de-sac.

55. Despite this apparent “solution”, I consider that the proposed access arrangements remain unsatisfactory. Whilst it may be that technical standards can be achieved, the access appears to be contrived and would provide an awkward and unattractive approach to the proposed housing area. I also believe the proximity of the access to residential property, especially the rear gardens of houses in Dean Park Court, creates the potential for an unacceptable impact on existing amenity.

56. All-in-all, I conclude that the development of this site would not constitute organic growth of Kirkcaldy. It would not relate naturally to the existing residential property to the south, particularly in terms of the suggested access arrangements. This analysis leads me to conclude that the development of the site for houses would not accord with the objective of Scottish Planning Policy in the delivery of high quality places. In turn, the proposed plan should not be modified to include the allocation of the site for housing.

57. In reaching this conclusion, I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the 5-year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under Issue 2b (Homes) with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that this site would nevertheless be unacceptable because the adverse impacts identified above would outweigh the benefits of addressing any shortfall.

Land safeguarded for port use

58. The land allocated for employment purposes in the harbour vicinity, as indicated in the Inset Map for Kirkcaldy and Dysart, shows discrepancies from the ownership map (supporting document SD10) provided by Forth Ports Ltd. The ownership map identifies the correct boundary of the operational land of Kirkcaldy Harbour and the Inset Map for Kirkcaldy and Dysart should be adjusted accordingly.

59. The green network symbols on the Indicative Green Network map should be adjusted to ensure that they do not encroach on the operational land of the port.

Impact on health care facilities

60. Discussions with NHS Fife regarding possible impact on healthcare services would no doubt be beneficial. However, such discussions can take place irrespective of
whether they are mentioned in the proposed plan. Accordingly, there is no requirement to alter the proposed plan.

Site KDY 003 Chapel Extension, John Smith Business Park

61. The construction of this site is well underway and the proposed plan is clear in providing an estimated capacity of 285 houses. The annual housing land audit provides details on the rate of progress and indicates the number of houses completed along with those remaining. On this basis, no change is necessary.

Site KDY 004 Dunnikier Maltings

62. The construction of this site is also well underway and the proposed plan is clear in providing an estimated capacity of 199 houses. The annual housing land audit provides details on the rate of progress and indicates the number of houses completed along with those remaining. On this basis, no change is necessary.

Site KDY 005 Ferrard Road

63. Again, the construction of this site is well underway and the proposed plan is clear in providing an estimated capacity of 119 houses. The annual housing land audit provides details on the rate of progress and indicates the number of houses completed along with those remaining. On this basis, no change is necessary.

Site KDY 014 Hayfield Road

64. Although only a small part of the site lies within the outer section of the Hazardous Site Consultation Zone, this is a constraint that has an implication, albeit limited, for any proposed development of the site. Nevertheless, it appears that buildings containing the hazard have been demolished and the removal of the hazardous site designation is being pursued. Whilst the Health and Safety Executive provides guidance through Planning and Development near Hazardous Installations, I consider a precautionary approach is justified and the proposed plan should make reference to the consultation zone as a development requirement.

65. I also agree that in view of potential contaminated land issues, a site-specific risk assessment should be identified as a development requirement.

Site KDY 017 Factory Road/Nairn Street

66. It is clear that the regeneration of urban areas can create tensions when new residential development is being integrated within long-standing industrial areas where, as in this case, some of the established activities remain operational. Nevertheless, significant new residential development has already been undertaken in the vicinity, apparently successfully, and is itself becoming established. This includes land to the south of Nairn Street opposite site KDY 017 and also site KDY 004, Dunnikier Maltings, a large development which is under construction. The proposed plan recognises the potential impacts from both the railway and the nearby industrial activities. Indeed, the railway line would itself provide an intervening space between the development site and industry to the north.

67. The proposed plan indicates the site provides an opportunity for both housing and
commercial uses. In itself this mixture would require very careful design to ensure compatibility. The proposed plan also provides a commitment to working with key stakeholders. Whilst Forbo Flooring UK would prefer the complete removal of the housing allocation on the site, the commitment to liaison is welcomed. Helpfully, the council repeats that commitment in the response to the representation.

68. As indicated, I recognise the introduction of new uses in this area has the potential to be incompatible with established activities. However, I consider that a housing element could be located within site KDY017 without inevitable detriment to the level of residential amenity required by the incoming occupants and without prejudice to the continuing activities of existing uses within the vicinity. The envisaged stakeholder liaison could assist in this process. In turn, I believe the proposed plan does not require alteration.

KDY 019 Victoria Fields

69. In allocating the site for employment purposes, the proposed plan draws attention to the possibility of development related to the adjacent Victoria Hospital. In arguing for a housing allocation, Miller King Kirkcaldy Ltd questions the prospects of development of this nature.

70. Opposing residential development, the council states that residential access by means of Smeaton Road would not be desirable environmentally. Although it is reasonable to hope that improvement will take place, I agree the appearance of this approach is currently unsatisfactory.

71. In turn, Miller King has confirmed that an alternative access could be provided from the north via Calender Avenue, a cul-de-sac. This road currently provides access to some 88 houses and the council indicates that the Transportation Development Guidelines would allow a total of 200 houses to be serviced under this arrangement. Miller King initially suggested an indicative site capacity of 50-100 units although this was subsequently amended to “circa 100 units”.

72. I have noted the claim that hospital-related employment development on the site is unlikely. This has not been disputed by the council. I am also aware that a significant amount of former employment land in the vicinity is no longer used for employment purposes. Whilst some employment land remains – protected under the policies of the proposed plan – there has been a continuing process of land use change, particularly for house building.

73. The central brownfield nature of various sites has clearly led to support for the principle of residential development. I have noted the employment land supply for Kirkcaldy/Dysart contained in the Fife Employment Land Strategy 2014-2021 where the total supply is shown to be 79.2 hectares. The seven-year requirement is 29.4 hectares and the marketable supply is 10.5 hectares. Despite this identified shortfall in marketable land, I believe that site KDY 019 offers development potential beyond employment land.

74. Taking account of the foregoing, I believe that as a central brownfield location, site KDY 019 has attributes that commend it for housing. I also accept that employment land potential related to the Victoria Hospital is, at best, limited. Nevertheless, in view of the wider supply situation of employment land in Kirkcaldy, I consider that the potential for
using all or part of the site for employment use should be retained. To recognise both the housing potential and the possibility of providing employment land, I consider that the site should be allocated as a development opportunity with reference to both potential uses. In the event of housing being constructed on part of the site, the balance should be restricted to Class 4, Business Use.

75. Insofar as the potential housing element is concerned, I agree with the council that amenity considerations should limit access to any housing development via Smeaton Road to construction vehicles. The permanent vehicular access to any housing should be via Calender Avenue and an estimated capacity of 100 units should be indicated. This total would be a little below the maximum permitted by the council’s guidelines and accords with the revised requirement of Miller King Kirkcaldy Ltd. At no time should there be a direct link between Smeaton Road and Calender Avenue in order to prevent an unacceptable flow of construction or industrial traffic through the residential area via Calender Avenue.

76. The discussion on site KDY 014, Hayfield Road, includes consideration of a Hazardous Site Consultation Zone along with a recommendation requiring a site-specific risk assessment. The consultation zone also covers much of site KDY 019. As previously indicated, the removal of the hazardous site designation is being pursued but, to accord with site KDY 014, I consider that a risk assessment should be stipulated as a development requirement.

77. The proposed plan should be modified accordingly.

Site KDY 020 Dunnikier Business Park

78. A significant part of this wider area of employment land has already been developed. This includes the development of land adjoining the ancient woodland to the west. I was unable to determine whether or not the development that has been undertaken has had any significant impact on the integrity of the ancient woodland. Visual inspection did not suggest obvious detrimental effects.

79. I do not accept that the remaining area of employment land allocated under KCY 020 should be deleted as the development site extends some distance from the edge of the ancient woodland. However, I agree that controls should be applied to protect the woodland and note the suggestion that this should involve survey work and protective buffering. Indeed, the council’s response indicates that the need for a buffer strip could be included in the proposed plan although a requirement for a more detailed survey could determine the extent of any strip through the development management process.

80. I therefore believe the proposed plan should be amended to include reference to the ancient woodland and the likely need for a protective strip, the extent of which would be determined following a detailed survey.

Site KDY 022 Wheatfield Road

81. Land to the north and south of this allocated site has been developed with boundaries adjoining the ancient woodland to the west. I was unable to determine whether or not the development that has been undertaken has had any significant impact on the integrity of the ancient woodland. Visual inspection did not suggest
obvious detrimental effects.

82. I do not accept that the area of employment land allocated under KDY 022 should be deleted as the development site extends some distance from the edge of the ancient woodland. However, I agree that controls should be applied to protect the woodland and note the suggestion that this should involve survey work and protective buffering. Indeed, the council’s response indicates that the need for a buffer strip could be included in the proposed plan although a requirement for a more detailed survey could determine the extent of any strip through the development management process.

83. I believe the proposed plan should be amended to include reference to the ancient woodland and the likely need for a protective strip, the extent of which would be determined following a detailed survey.

Site KDY 025 Kirkcaldy East

84. The scale and nature of Kirkcaldy East is such that it is regarded as being of strategic significance in accordance with the provisions of SESplan. At this early stage of the planning process the extent of the development is identified on the Inset Map for Kirkcaldy and Dysart. The written statement provides further detail in the descriptive text for site KDY 025 and the related Development Framework Diagram. Both the text and the framework diagram are limited to the general principles of the development. The text refers to the role of Designing Places and the council’s own guidance in respect of implementing the wider development. Community facilities and two neighbourhood centres are included as elements of the development to be addressed. The framework diagram shows the locations of the neighbourhood centres.

85. Although confirmation in the proposed plan of a site for a health care facility has been requested, it appears that a specific site has not yet been identified. In any event, I do not consider that it would be appropriate to include such a level of detail at this stage of the process. I have no reason to doubt that discussions between the relevant parties will continue or that a site for a health care facility will be identified.

86. Insofar as the Glossary definition of “Community Facilities or Services” makes no reference to healthcare, it would be helpful, for the avoidance of doubt, to indicate that the community facilities in Kirkcaldy East include healthcare services.

Site KDY 026 Kirkcaldy South West

87. As in the case of site KDY 025 above, the reference to community facilities does not explicitly include healthcare services. Again, it would be helpful, for the avoidance of doubt, to indicate that the community facilities in Kirkcaldy South West include healthcare services.

Site KDY 029 Victoria Road, Former Power Station

88. There can be no doubt that the redevelopment of this urban site is a fully justified requirement. However, it is apparent that the former power station, a category B listed building, represents a severe challenge. Indeed, the granting of planning permission for the demolition of the building reflects the recognition by the council of the difficulties faced in the redevelopment of the site. Nevertheless, significantly, listed building consent for demolition has not been granted.
89. When an application for listed building consent for demolition was referred to the Scottish Ministers, (the then) Historic Scotland stated that it had not been adequately demonstrated the proposals met any of the demolition tests set out in the Scottish Historic Environment Policy, or that all options for re-use of the building, in whole or part, had been explored. The application was subsequently withdrawn.

90. Until it has been clearly demonstrated that all relevant matters have been fully pursued, there should be no presumption that the former power station should be demolished. As stated in Scottish Planning Policy, listed buildings should be protected from demolition. In turn, the proposed plan is justified in seeking the redevelopment of the former power station as a priority. No modification should be made to the terms of site KDY 029.

Site KDY 034 Thistle Street car parks

91. The preferred uses have been identified in the proposed plan but this does not preclude a range of other uses within the site. Further guidance in this respect is found in Figure 6.5, Acceptable Uses in Town Centre Framework Areas, which shows the western part of the site to be within the core retail area and the eastern section within the wider town centre and waterfront. Acceptable ground floor uses within the core retail area are use classes 1, 2, 3 and 11 whilst, in the wider town centre, use classes 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11 and sui generis are acceptable.

92. I consider the council is entitled to identify preferred uses without prejudice to any proposals for other use classes within the scope of Figure 6.5. No modification is required.

Site KDY 035 Former swimming pool site

93. The preferred uses have been identified in the proposed plan but this does not preclude a range of other uses within the site. Further guidance in this respect is found in Figure 6.5, Acceptable Uses in Town Centre Framework Areas, which shows the site to be within the core retail area. Acceptable ground floor uses within the core retail area are use classes 1, 2, 3 and 11.

94. I consider the council is entitled to identify preferred uses without prejudice to any proposals for other use classes within the scope of Figure 6.5. No modification is required.

Site KDY 038 Former Bus Painters Garage

95. The preferred uses have been identified in the proposed plan but this does not preclude a range of other uses within the site. Proposals for other uses would be considered on merit and should not be discounted simply because of the stated preferences. No modification is required.

Site KDY 044 Nairn Street

96. The preferred uses have been identified but these do not include residential development. Subject to type and scale, Forbo Flooring is content with the specified preferences and the omission of residential development.
97. In other instances where “preferred uses” have been identified (see sites KDY 034, 035 and 038 above), the council has pointed out that this does not necessarily preclude the approval of other uses that might be proposed. On this basis, it can be assumed that a proposal for residential development on site KDY 044 would be considered on merit. In terms of the proposed plan, potential nuisance impacts from the adjacent railway and nearby industrial activities would require to be explored further. This, states the proposed plan, would require a noise impact assessment.

98. As explained under site KDY 017, Factory Road/Nairn Street, tensions can be created by proposals to undertake residential development near existing factories. I can appreciate that such a tension could occur in this instance should housing be proposed. However, I am satisfied that any such proposal is capable of assessment through the development management process. In turn, I am prepared to accept the guidance applied to site KDY 044 in terms of preferred uses and consider that modification is not necessary.

COUNTRYSIDE AREA

Site LWD 002 Begg Farm

99. The bonded warehouses cover a relatively small portion of the wider site which extends over some 221 hectares. A 2.4 metre high palisade fence defines the operational boundary of the bonded warehouses. Indeed, virtually the entire area within the palisade fence is covered by the warehouses and the cask storage area. The fence extends beyond the boundary of site LWD 002 to the northeast and west and also does not coincide along the north-western boundary. It is therefore appropriate to adjust the boundary of the employment land shown under LWD 002 to accord with the operational boundary. The Inset Map for Kirkcaldy and Dysart and the local development plan Proposals Map should be altered accordingly.

100. It was initially indicated that the entire site is, of necessity, secure and therefore unsuited in principle to recreational purposes. However, more details have subsequently been provided showing the 2.4 metre high palisade fence which defines the boundary of the “secure area” with a “connecting path” running from the northeast to the southwest corners of the wider site.

101. The connecting path does not impinge on the secure area and is designated “public”. The route passes a number of features indicating public access and recreational features including a bird hide, public art, interpretation boards and seating areas.

102. The Glossary in the proposed plan defines “Green Networks” and indicates that “They will provide most if not all of the following functions: recreational greenspace; habitat; drainage; access and landscape setting.”

103. The structural landscaping within the wider site will provide a distinct habitat, make provision for sustainable drainage and enhance the landscape setting of the complex. Indeed, as the council points out, the provision of the landscaping was an important mitigation feature. Although it may be argued that the landscaping is essentially private open space approved under the terms of the planning permission for the development, it is clear that there is also an intention to provide a facility for significant public recreational activity. In any event, it is apparent from the terms of Planning Advice Note
65, Planning and Open Space, that private gardens or grounds are not to be disregarded as “greenspace” falling within the definition of open space.

104. As explained, buildings and cask storage cover virtually the entire secure area. The land within the palisade fence therefore cannot be regarded as greenspace. However, it is clear therefore that the remainder of the site, not contained within the secure area, complies with the definition of green networks. It has been suggested that this wider area should not be identified as part of the indicative green network as this could create safety concerns and be detrimental to operations of the developed part of the site. However, on the basis of the Glossary definition and the proposed recreational uses over part of the site, I conclude that an indicative green network allocation is justified other than for the secure area. The Interactive Mapping Tool, which is part of the local development plan, should be adjusted accordingly.

Reporter's recommendations:

I recommend that the following modifications be made:

1. On page 33, under Site BUR 003, Land at Haugh Road reduce the estimated capacity from “40” to “20” and insert a further development requirement as follows:

   “A flood risk assessment requires to be undertaken prior to development on this site. Design of development must take account of the findings of the flood risk assessment.”

2. On the Burntisland Inset Map, amend the boundary of the employment land to reflect the operational area of Burntisland Port as shown on the map of the ownership boundary provided by Forth Ports Ltd (map reference number: PDR71239/RC, September 2013). The map is supporting document SD4 for Issue 10.

3. On page 106, under Site KNH 002, Viewforth Place, amend the descriptive text as follows:

   “A higher density residential development is appropriate on this site, especially should flats be proposed, given its location along a public transport corridor.”

4. On page 106, under Sites KNH 003 & KNH 004, East of Kinghorn Loch, revise the “additional development requirements” (in both instances) in respect of the buffer strip to:

   “A buffer strip is required along the edge of the loch. The buffer strip should be a minimum of 6-12 metres wide.”

5. On page 112, under Site KDY 014, Hayfield Road, add the following “additional development requirements”

   “A site-specific contaminated land assessment is required.

   A small part of the site lies within a hazardous site consultation zone and, until such time as this designation is removed, the requisite consultation procedure must be undertaken.”
6. On page 113, under Site KDY 019, Victoria Fields, amend the heading as follows:

“Description: Housing and/or Employment Opportunity
Est. capacity (housing): 100”

Amend the text as follows:

“Status, additional development requirements, and other information

Should housing be proposed, there should be a maximum of 100 units and any remaining part of the site should be used to provide employment land.

Housing: permanent vehicular access to the site must be taken only from Calender Avenue and no vehicular traffic should be able to access the development from Smeaton Road once the development has been completed. Temporary access to the site should be taken from Smeaton Road during construction of the development to avoid construction traffic passing along Calender Avenue; a pedestrian route to Smeaton Road should be provided once the site has been developed.

A buffer zone should be established between the housing and the adjacent waste management and employment areas to provide separation between the different uses and safeguard residential amenity and the existing businesses. The extent of buffer should be defined at the detailed application stage.

Employment: should development be limited to employment use: Classes 4 (business), 5 (general industrial), and 6 (storage and distribution) would be appropriate; should partial housing development be proposed: Class 4 (business) only would be appropriate.

Access for employment land to be taken from Smeaton Road.

A buffer zone should be provided between any housing, existing or new. The extent of buffer should be defined at the detailed application stage.

A flood risk assessment and high quality sustainable drainage scheme are required.

Part of the site lies within a hazardous site consultation zone and, until such time as this designation is removed, the requisite consultation procedure must be undertaken.

Green Network Priorities:

- Establish a high quality development edge fronting on to the greenspace immediately south of the site and provide good access from the development into the greenspace and through to Den Road as a key route to the town centre.
- Provide an east-west pedestrian and cycle path along the southern boundary of the site.
- Consider the appropriateness of an off-site contribution to enhance the quality and range of uses of the Den Road greenspace south of the site and towards re-establishing a foot/cycle connection along the site’s eastern edge to connect Smeaton Rd with Hayfield Rd.
• Deliver a good development edge onto the route along the eastern boundary of the site, and provide path connections to access this route from the development.
• Protect the woodland habitat to the north east of the site.”

7. On the Kirkcaldy and Dysart Inset Map, change the allocation of site KDY 019 from “Employment” (deep purple) to “Development Opportunity” (red cross hatch).

8. On page 114, under Site KDY 020, Dunnikier Business Park, insert the following “additional development requirement” between the requirement for a buffer strip and a flood risk assessment:

   “Account must be taken of the ancient woodland to the west. It is likely that a protective strip will be required, the extent of which should be determined following a detailed survey.”

9. On page 114, under Site KDY 022, Wheatfield Road, insert the following “additional development requirement”:

   “Account must be taken of the ancient woodland to the west. It is likely that a protective strip will be required, the extent of which should be determined following a detailed survey.”

10. On page 115, under Site KDY 025, Kirkcaldy East, amend the seventh bullet point as follows:

    “• Community facilities including healthcare services;”

11. On page 116, under Site KDY 026, Kirkcaldy South West, amend the fifth bullet point as follows:

    “• Community facilities including healthcare services;”

12. On the Kirkcaldy and Dysart Inset Map, amend the boundary of the employment land to reflect the operational area of Kirkcaldy Harbour as shown on the map of the ownership boundary provided by Forth Ports Ltd. The map is supporting document SD10 for Issue 10.

13. On the Indicative Green Network Map, reduce the length of the green network opportunity in the vicinity of Kirkcaldy Harbour to ensure that the arrows do not encroach onto operational land as defined under Modification 12 above.

14. On the Kirkcaldy and Dysart Inset Map, the Proposals Map and the Indicative Green Network map, amend the boundary of site LWD 002, Begg Farm, to ensure compliance with the secure operational area bounded by the palisade fence. The boundary is as illustrated on the drawing attached to representation 1149 entitled Proposed Site Security Fence, number AZ70534:97:005 Revision D. The indicative green space should not encroach within the line of the boundary.
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<td>Thirza Harley</td>
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**PROPOSED FIFE LOCAL DEVELOPMENT PLAN**

**COUNTRYSIDE AREA**

- Jacobs (1205)
- Thomas Kinnaird (1935)
- Hargreaves (2055, 2791)
- Margaret Hall (3910)

**LOCHORE**

- LHR 001 Capledrae Farm
  - Donnie Scott (509)
  - SEPA (3258)

- LHR 003 Loanhead Avenue
  - SEPA (3554)

- LHR 004 Lochore Meadows
  - SEPA (3556)

**LUMPHINNANS**

- LPH 001 Lochgelly Road
  - Moray Estates Development Co (1882)
  - SEPA (3557)

- LPH 003 Land to the north of Lumphinnans
  - Hargreaves (2789)
  - SEPA (3558)
Zoe Morris (476)
Jane MacIntosh (479)
Angela Lister (577)
John Lister (578)
Owner Occupier 16 Crambeth Place (794)
John Collier & Sons (972, 974)
A Watson (1126)
A Gordon (1275)
Lomond Group (3734)
NHS Fife (3848)
Ann Hill (3922)
A Duff (3923)
L Smith (3924)
KEL 004 Netherton Farm
SEPA (3523)
KEL 005 Kelty South West
Gillian Temple (601)
Ian Westwater (1076)
William Kirkhouse (1459)
SEPA (3524)

Provision of the development plan to which the issue relates:

| Settlement Plans: Ballingry, Lochore, Crosshill, Glencraig, Cardenden, Dundonald, Auchterderran, Bowhill, Cowdenbeath, Hill of Beath, Lumphinnans, Kelty, Kingseat, Lochgelly & Countryside Area |

Planning authority's summary of the representation(s):

**BALLINGRY, LOCHORE, CROSSHILL & GLEN CRAIG**

**BALLINGRY**

**Ballingry Issues**

NHS Fife (3835): Potential additional 637 houses in this area could have impact on local healthcare services. While it would appear that developments have not yet progressed, it would be of benefit for early discussions with NHS Fife to understand potential implications.

**BGY 002 – Land to the east of Ballingry**

SEPA (3251): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken. Request inclusion of a buffer strip requirement to be added to the development requirements for this site.

**BGY 004 – Former Benarty Centre**

SEPA (3307): Support the inclusion within the Development Requirements for a Flood
Risk Assessment (FRA) to be undertaken.

LOCHORE

LHR 001 – Capledrae Farm

J Lochead (509): Support allocation of site LHR001 and provide additional wording for the development requirements of this site to help provide flexibility with regards to the layout of the development and open space.

LHR 003 – Loanhead Avenue

SEPA (3554): Support the inclusion within the Development Requirements for a buffer strip along the watercourse.

LHR 004 – Lochore Meadows

SEPA (3556): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken and for a buffer strip along the watercourse.

CROSSHILL

CRH 001 – Former Meedies Neuk Bar

SEPA (3344): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken.

GLENCRAIG

GLC 001 – Glencraig East

SEPA (3404): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken and for a buffer strip along the watercourse.

CARDENDEN, DUNDONALD, AUCHTERDERRAN & BOWHILL

Cardenden Issues

NHS Fife (3838): Potential additional 962 houses in local area could impact on healthcare services.

CDD 001 – Bowhill Colliery

Cardenden Community Council (66): This site was originally allocated for employment/housing, but a planning application has been submitted for a possible care-home.

SEPA (3314): Support the inclusion within the Development Requirements for a buffer strip along the watercourse and the requirement to consider through a feasibility study, the potential for restoration and improvement of the water environment through the site design and support the inclusion of a Site Requirement for high quality Sustainable Urban Drainage System (SUDS).
CDD 002 – Cardenden South

SEPA (3316): Support the inclusion within the Development Requirements for a buffer strip along the watercourse and the requirement to consider through a feasibility study, the potential for restoration and improvement of the water environment through the site design and support the inclusion of a Site Requirement for high quality Sustainable Urban Drainage System (SUDS).

CDD 003 – Dunondonal South

Miller Parkgate Ltd (965), Bracken Lea Homes Ltd (in receivership) (1506): Support allocation of site CDD003 and provide additional supporting information to show that the site is effective and meets the test of effectiveness as set out in PAN2/2010 (CD10).

CDD 004 – Cardenden Road East

Cardenden Community Council (67): This site is bounded by a railway line and sewage works and considered inappropriate for housing. Commercial development would be more suitable.

Barratt David Wilson Homes (1342): Support allocation of site CDD004 and provide additional supporting information relating to the effectiveness of this site.

Marie Buckleygray (2339): Site references referred to in submission are from the development strategy consultation. Site CDD001 is allocated site CDD004 while site CDD04b is allocated site CDD005. Object to allocation of this site due to impacts on the environment, loss of natural habitat and fauna, loss of animal habitat (badger, bat and deer), flooding, ground stability, lack of infrastructure (school and GP capacity) and increased traffic.

SEPA (3317): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken and for a buffer strip along the watercourse. Also support the inclusion of the requirement to consider through a feasibility study, the potential for restoration and improvement of the water environment through the site design and support the inclusion of a Site Requirement for high quality Sustainable Urban Drainage System (SUDS).

CDD 005 – Cardenden Road West

Marie Buckleygray (2338): Site references referred to in submission are from the development strategy consultation. Site CDD001 is allocated site CDD004 while site CDD04b is allocated site CDD005. Object to allocation of this site due to impacts on the environment, loss of natural habitat and fauna, loss of animal habitat (badger, bat and deer), flooding, ground stability, lack of infrastructure (school and GP capacity) and increased traffic.

SEPA (3318): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken and for a buffer strip along the watercourse. Also support the inclusion of the requirement to consider through a feasibility study, the potential for restoration and improvement of the water environment through the site design and support the inclusion of a Site Requirement for high quality Sustainable Urban Drainage System (SUDS).
CDD 006 – Woodend Road

Cardenden Community Council (68): This site is considered too large and out of proportion with existing housing. A planning application was submitted for this site, but concerns were expressed that the access to the site would not accommodate the number of vehicles envisaged.

Hendersons Surveyors (1561): Support for inclusion of this site and confirm this sites effectiveness and that discussions are ongoing with developers.

SEPA (3319): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken and for a buffer strip along the watercourse. Also support the inclusion of the requirement to consider through a feasibility study, the potential for restoration and improvement of the water environment through the site design and support the inclusion of a Site Requirement for high quality Sustainable Urban Drainage System (SUDS).

CDD 007 – Cardenden Road

SEPA (3319): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken and for a buffer strip along the watercourse. Also support the inclusion of the requirement to consider through a feasibility study, the potential for restoration and improvement of the water environment through the site design and support the inclusion of a Site Requirement for high quality Sustainable Urban Drainage System (SUDS).

CDD 008 – Bowhill Colliery

Cardenden Community Council (69): This site and adjoining land extend beyond the existing settlement boundary. Although the land is presently used for employment, it is scheduled for part restoration.

SEPA (3319): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken. Also support the inclusion of the requirement to consider through a feasibility study, the potential for restoration and improvement of the water environment through the site design and support the inclusion of a Site Requirement for high quality Sustainable Urban Drainage System (SUDS).

CDD 009 – Auchterderran Centre

Cardenden Community Council (70): This site comprises listed buildings, which need to be taken into consideration before developing.

SEPA (3322): Support the inclusion within the Development Requirements for a buffer strip along the watercourse and inclusion of the requirement to consider through a feasibility study, the potential for restoration and improvement of the water environment through the site design. Support the inclusion of a Site Requirement for high quality Sustainable Urban Drainage System (SUDS).
COWDENBEATH, HILL OF BEATH & LUMPHINNANS

COWDENBEATH

Cowdenbeath Issues

Marise Sinclair (1430): Object to the green network designation in and around the Fordell Industrial Estate on the basis that a) this conflicts with current and approved usage for existing employment and agricultural purposes, and b) in discussions and communication with Fife Council on 19/11/14 it has become clear that no Natural Assets exist within either of these 2 areas.

An alternative boundary is proposed (see representation 1430).

NHS Fife (3839): Additional 431 houses under construction and potential additional 588 houses in this area could have impact on local healthcare services. It would be of benefit for discussions with NHS Fife to be arranged to confirm status of local GP and other healthcare services.

COW 001 – Beath Glebe

SEPA (3335): Support the inclusion within the Development Requirements for a buffer strip along the watercourse.

COW 002 – King Street 2

Persimmon Homes (1968): Number of units remaining on site is not identified. Without this information it is impossible to determine what impact this has on the Local Development Plan Housing Supply, and whether the supply is correct.

COW 003 - Leuchatsbeath

Persimmon Homes (1969): Number of units remaining on site is not identified. Without this information it is impossible to determine what impact this has on the Local Development Plan Housing Supply, and whether the supply is correct.

COW 004 – Adjacent gas works

SEPA (3336): Support the inclusion within the Development Requirements for a buffer strip along the watercourse.

COW 005 - Rosebank

SEPA (3337): Support the inclusion within the Development Requirements for a buffer strip along the watercourse and support the inclusion of a Site Requirement for high quality SUDS

COW 006 – Glenfield Industrial Estate

SEPA (3339): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken
COW 009 – Woodend Business Centre

Lanscots Developments Ltd (1927): Object to the change of zoning of this site from mixed use to employment on the following grounds; low demand for additional business land in Cowdenbeath, housing is required on the site in order to cross-subsidise the provision of new and refurbished business units, there is a recognised need for private and affordable housing within Fife that the proposed Woodend site could address and further employment uses on the north and north-western part of the Woodend site would be incompatible with the amenity of the residential properties to the north.

COW 011 – North End Park

SEPA (3340): Support the inclusion within the Development Requirements for a buffer strip along the watercourse.

COW 012 – High Street Gap site

SEPA (3342): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken

LUMPHINNANS

LPH 001 – Lochgelly Road

Moray Estates Development Company (1882): Support the inclusion of this site but object to the development requirements regarding improved access and a southwards pedestrian link.

SEPA (3557): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken and for a buffer strip along the watercourse. Also support the inclusion of the requirement to consider through a feasibility study, the potential for restoration and improvement of the water environment through the site design.

LPH 003 – Land to the north of Lumphinnans

Hargreaves (2789): The opportunity to recover the shallow coal deposit prior to, or as an integral part of, the development should be recognised to prevent unintentional sterilisation

SEPA (3558): Support the inclusion within the Development Requirements for a buffer strip along the watercourse.

KELTY

Kelty Issues

Jean Hogg (23), George Hogg (25), John Miller (35), Jean Miller (36), James Harley (37), Catherine & Michael Gibson (38), Paul McDonald (109), David Wilson (120), A Murray (220), Michael Murray (221), Linda Gray (232), Eddie Gray (234), Marina Wilson (238), Andrew Ednie (315), Ann Duff (316), C Rettie (317), Carol Hackett (318), David Fernie (319), Elizabeth Carr (320), Freya Riach (321), Ian D Gordon (323), J Duncan
(324), James Lamond (326), Janet Fernie (327), John Duffy (328), Joseph Hill (329), Mary and David Sinclair (330), A Harley (331), Jordan Hailstones (332), Keiron Bayne (333), Mr & Mrs J Philip (335), Mr & Mrs M J Boyle (336), Mr & Mrs T Hailstones (338), Ann Lamond (340), April Hailstones (341), E Hall (342), E Harley (343), Isa Duffy (344), Janet Alexander (345), N Young (346), Yvonne McDonald (347), Shana Robertson (349), Agnes Ednie (348), Colin Stark (387), Dr Asim & Ann Azfer (388), Edward Wright (389), Eleanor Lillicrapp (390), Julie Stark (391), Karla - Jane Hill (400), Linda Smith (402), Margaret Adams (404), Mr & Mrs Bernie Richardson (407), Mr & Mrs E Lindsay (409), Mr & Mrs P McArthur (411), Gary Adams (414), Jim Harley (434), Mr & Mrs Lowe (438), Paul Martin (439), William Adams (442), A Lawrie (443), Tracey Wright (444), Neil Cameron MacKay (460), Nicole Carle (463), R Lillicropp (465), Ruth Newell (466), Clifford Smith (467), Thirza Harley (475), Zoe Morris (476), Jane MacIntosh (479), Angela Lister (577), John Lister (578), Owner Occupier (794), A Watson (1126), A Gordon (1275), Ann Hill (3922), A Duff (3923), L Smith (3924): Support inclusion of site KEL 005 due to its close proximity to the centre of Kelty, it will provide employment opportunities and balance out the settlement after the recent developments in the north east.

Support non-inclusion of sites (Candidate site ref LDP-KEL004 and LDP-KEL005) to the north of Kelty on grounds of coalescence, access issues, road safety, parking and the fact that these sites are not needed when there is a bigger development that is supported to the south of Kelty.

John Collier & Sons (972 & 974): Object to non-inclusion sites (Candidate site ref LDP-KEL004 & LDP-KEL005). Supporting information is provided to show the effectiveness of this site. Concerns over this site being removed by Committee when it had officer approval for allocation. The Council has offered no justifiable or sound planning reasons for its very late deletion from the Proposed Plan.

Lomond Group (3734): Object to non-inclusion of this site (Candidate site ref LDP-KEL002). More sites should be allocated to meet the housing land requirement. This site could compliment site allocated KEL 005 by providing a range and choice of housing. Supporting information is provided to show the effectiveness of this site. Site should be allocated as a Care Village.

NHS Fife (3848): Additional 130 houses under construction and potential additional 1228 houses in this area could have impact on local healthcare services. It would be of benefit for discussions with NHS Fife to be arranged to confirm status of local GP and other healthcare services.

KEL 004 – Netherton Farm

SEPA (3523): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken and for a buffer strip along the watercourse.

KEL 005 – Kelty South West

Gillian Temple (601), Ian Westwater (1076), William Kirkhouse (1459): Object to inclusion of this proposal on the following grounds: Vicinity to existing properties, loss of views from existing properties, impact on existing residents, and adverse effect on property prices within the area. Severe impact on two or more small local businesses. Site is too large, environmental impact, access/road safety, increase in traffic, lack of
local amenities, lack of infrastructure (schools, doctors); development of prime agricultural land, this number of houses is not needed.

SEPA (3524): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken and for a buffer strip along the watercourse.

KEL 008 – Old Gas Works

SEPA (3526): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken.

KINGSEAT

KST 001 – Kingseat Road

John & Marilyn Penman (429), Robert Hutchinson (423), Andrew R Duff (396), Watson Wilson (397), Walter Sinclair (401), W H Ramsay (406), T Hogg (410), A Spowart (412), Stewart Gunn (413), Steven Liddle (415), Alexander Lees (418), Sheena Keenan (419), Sandra Stothard (421), Alexander Whyte (426), S R Hutchinson (427), Sheila Colville (430), Allyson Fawcett (435), R Stuart (431), R R H Dacre (436), Andrew Penman (441), Anne Clayton (452), R Miller (445), R Kerr (448), Robin Todd (449), Peter McNamee (450), Peter Fawcett (454), Paula Gregory (456), Owner Occupier (458), Malcolm Hall (459), Leslie Smith (489), Margaret Heawood (469), Michael Scanlin (461), Margaret Smith (468), Margaret Crawford (472), Malcolm MacKay (477), M Stewart (480), M Shread (481), M Spencer-Bowles (487), M Hogg (488), Lesley Brookes (492), June Greig (546), Wilma Donaghy (494), K Donaghy (496), Laura Wiseman (498), Laura Macanachie (521), Kathleen Campbell (523), Joan Spowart (526), Jeff Wiseman (528), Janette Wiseman (531), Jacqueline Welsh (533), Janet Fisher (535), J Whyte (536), Julie Millar (538), J McLure (541), J M Stothard (543), Ian Todd (545), Helen McLure (548), Grace Scanlin (550), George Campbell (552), Forbes N Stuart (556), Fiona Dacre (558), Elizabeth Kerr (559), E A Lamond (561), Duncan Fisher (563), Dorothy M Johnstone (564), Doreen Esnol (565), Donald Gregory (569), Dawn Proudfoot (579), Mr & Mrs A Stewart (573), B Hamilton (574), B W Glover (581), Claire Richardson (582), Claire Henderson (584), Claire Beurskens (586), Carol Smith (588), C Lees (590), C Crawford (592), Brian Crawford (594), Allan & Margaret Stewart (687), Barbara Sands (599), Margaret Bingham (1133), L Bingham (1131), Colin R White (1113), Mr & Mrs A Marshall (1136), Muriel Nicol (1140), Robert Nicol (1143), Kenneth Coles (1263), M R Grant (1267), Karen Galbraith (1943), D Keningale (2373), Ean Galbraith (2397), Norman Woolley (2406), Patricia Woolley (2414), Owner Occupier (3866), R Keningale (3926): All respondents object to the proposal using the following standard statement:

- The development of this proposed site should not be approved until the Northern Relief Road is completed, otherwise the traffic problems in Kingseat will be exacerbated further.
- Access to and from development onto minor roads will create dangerous traffic conditions.
- Lack of amenities within Kingseat to support further housing, including no footpaths out of village in any direction.
- Lack of local infrastructure e.g. schools, medical, shops, poor inadequate bus service to Dunfermline and other amenities.
- The use of prime agricultural land in Fife to build housing overspill for Edinburgh.
before existing strategic housing developments are delivered first.

- The visual impact on the entrance to the village and its spectacular views over the Forth valley.

The following respondents object to the proposal on the basis of some, or all, of the above and also elaborate on the following topics:

**Traffic and Access**

David Peat (110), Ethel C Marsh (125), Marion Peat (198), Eagle Glen Residents’ Association (209), Kingseat Community Council (357), June Simpson (814), Margaret Hall (1348), Arthur Sutton (1410), Cheryl Wilson (1775), Ann Wilson (1784), James Wilson (1786): The road network through the village is already busy and used as a ‘rat run’ to avoid congestion elsewhere (with respondents giving particular examples). Kingseat Road is a minor road with a blind summit and was never intended to support the volume or size of commercial traffic that it currently experiences. This proposal (and other proposals in north Dunfermline) will increase traffic and create added danger to pedestrians, cyclists and other road users. Access to the proposed site will have safety issues. Comments also refer to problems with ongoing maintenance and the need for upgrade of the Kingseat area road network, to cope with existing and extra traffic, the inadequacy/lack of pavements, non-observance of speed limits and difficulty for pedestrians in road crossing. Pupils would need transported to their schools exasperating transport volume issues.

**Amenities and Local Infrastructure**

David Peat (110), Marion Peat (198), Eagle Glen Residents’ Association (209), Kingseat Community Council (357), June Simpson (814), Margaret Hall (1348), Cheryl Wilson (1775), Ann Wilson (1784), James Wilson (1786): The village infrastructure is extremely limited – small store/post office, church, hotel, community centre in need of rebuilding and seldom open, limited open space, poorly drained park unsuitable for field sports. There are no footpaths or cycleways connecting the village to Dunfermline and an inadequate bus service. There is no school and capacity at the primary and secondary schools in the catchment area would be impacted upon given the additional houses proposed in the wider area. The housing in the village should be kept within the ability of the infrastructure to cope.

**Agricultural Land**

Kingseat Community Council (357), David Peat (110), Ethel C March (125), Eagle Glen Residents’ Association (209), Arthur Sutton (1410), Cheryl Wilson (1775), Ann Wilson (1784), James Wilson (1786): The land proposed to be developed is in agricultural use, arable and grazing, and it is incorrect (as stated in developer’s brochure submitted with rep 877) that the land is not suitable for arable use. Priority should be given to areas of lower agricultural value.

**Visual Impact**

Kathy Chesher (15), David Peat (110), Ethel C Marsh (125), Eagle Glen Residents’ Association (209), Kingseat Community Council (357), June Simpson (814), Margaret Hall (1348), Arthur Sutton (1410), Cheryl Wilson (1775), Ann Wilson (1784), James Wilson (1786), Marion Peat (198): Object to visual impact of the proposal on following
grounds:

- Kingseat has been winner of ‘Best Small Village in Fife’ award. Access to and from development onto minor roads will create dangerous traffic conditions.
- Entrance to the village will be ruined as will the outlook southwards
- Development will be out of place and the village’s character will be destroyed.
- Question the consultant’s report and its outcomes and viewpoints used.

Gas transmission

David Peat (110), Ethel C March (125), Eagle Glen Residents Association (209), Cheryl Wilson (1775), Ann Wilson (1784), James Wilson (1786): A National Gas Transmission line passes through the site, close to the south west edge of the development and is not suitable for proximity to housing.

Mineworking

Ethel C March (125), Margaret Hall (1348), Cheryl Wilson (1775), Ann Wilson (1784), James Wilson (1786): No up to date knowledge of the old mine workings under the site, land floods and ground condition issues. If the Loch Fitty open cast coal site is resurrected the proposed drainage of the loch could result in a destabilising effect on the surrounding land. The proposed development would be within approximately 800 metres of the open cast site boundary and also within the declared visual envelope of the site and impacts on its strategic appraisal.

Open Cast Site

Arthur Sutton (1410): The proposal to build 300 houses on the open cast site would satisfy the whole of Kingseat's needs by itself.

Vandalism

June Simpson (814): 50 extra houses will bring a large influx of residents with children who will not know the present members of the village and so the potential for vandalism due to anonymity will increase.

Overshadowing

E G Whale (133): The development, unless bungalows, will cast a shadow from November until March over respondent’s property resulting in failure of Photo Voltaic Panels, solar water heater and triple glazed sunroom.

Privacy

Arthur Sutton (1410): New houses on this site would invade the privacy of existing houses on the north side of the road.

Water Pressure

Margaret Hall (1348), Cheryl Wilson (1775), Ann Wilson (1784), James Wilson (1786): The proposal will exacerbate existing water pressure problems unless water capacity to
the village is increased.

Other

Marion Peat (198): There is no justification for changing the West Fife Development Plan so soon after approval.

E G Whale (133): The site plan is misleading and incorrect in relation to Eagle Glen residents’ ownership (plan submitted with rep 877).

SEPA (3256): This site is located in or adjacent to the functional flood plain or an area of known flood risk. Part of the site may not be suitable for development. It is likely that a watercourse is culverted beneath the site and as a result a Flood Risk Assessment is required prior to submission of a planning application.

John Hutcheson (1163): Objects to the non-allocation of land for residential allocation (circa 30 units) at Cuddyhouse Road, Kingseat (candidate site LDP-KST001). FIFEplan needs to conform with SESplan, citing specifically policies 1B, 6, 7, and to SESplan’s Supplementary Guidance (CD3) in relation to meeting housing need and demand. The allocation of land at Cuddyhouse Road is wholly in accordance with SESplan and its spatial strategy and is a logical choice, given the shortfall in the effective housing land supply. In relation to Policy 7 (page 44 CD2), the principle of allocating the land accords with the key policy context as set out within SESplan and its Supplementary Guidance given that:

- there are no impacts on any environmental, built or cultural heritage designations;
- the development can be designed in way that accords with the Council’s proposed Policy 11: Low Carbon Fife;
- the allocation is in keeping with the character of the settlement and local area;
- the site does not affect green belt, and;
- all required infrastructure can be delivered without public expense.

Development of this site fits with the six qualities of successful place included in Scottish Planning Policy (CD1). Referring to PAN2/2010 (CD10), given the shortfall in the land supply and the failure of the proposed FIFEplan to allocate sufficient land as required by Scottish Planning Policy, it is critical that new identified land is effective and deliverable. This submission complies with the test of effectiveness as set out in PAN2/2010.

Taylor Wimpey (877): Welcome proposal and are committed to delivering a high quality residential development on this site within the Plan period. The site will make a key contribution to the delivery of housing required within the Dunfermline Strategic Development Area and can be developed in an appropriate and sensitive manner.

Technical documents accompany the representation, including:

- landscape analysis and masterplanning work to inform how best to develop this site; and a
- Transport Access and Appraisal Report demonstrating that the site is capable of safe and suitable access.

This site represents a logical expansion of Kingseat, and it has been demonstrated that it can be developed so as sit within the landscape, maintain the setting of the town as
well as views out, incorporate appropriate accesses and connections, strong green edges and open space. A greater number of units, than the 50 stated in the proposed Plan, should be identified for the site in the interests of making best use of allocated land and to help ensure the identified housing need is met across the Council area.

LOCHGELLY

LGY 004 – West Cartmore

Persimmon Homes (1985): This site has been brought to the majority of large developer’s number of times during the past year, yet there remains no developer interest. Therefore the sites should be de-allocated or have the programming pushed back a significant number of years to allow the market to pick up. Marketability has been one of the main reasons the site has been unfavoured to date, and can be shown by our experience with house sales in close proximity.

LGY 007 – Lochgelly Strategic Development Area

David Kinnell (80): Proposal LGY 007 is on land that is subsiding.

Shell UK Ltd (503): Welcome the text in the development requirements relating to the pipeline consultation zones and request that any proposed developments within the Lochgelly SDA must accord with the advice of the Health and Safety Executive.

Anne R & Christopher Leivesley (943), James Blyth (992), P Gonnella (998), Sarah Daly (1002), Louise Stevens (1470): Object to Proposal LGY 007 specifically around the Lumphinnans Farm & access roadway (Lochgelly West). Development at Lochgelly West would have a detrimental impact on the quality of life and amenity of the residents of the existing rural cottages (loss of privacy is a key concern); this would be contrary to the policy on amenity. If the development goes ahead it must ensure that the quality of life of those in the local area is not adversely affected through use of appropriate screening and separation distances.

In addition the developers must: provide a representative (available at all times) to address any issues concerning the householders; account for any deviation from the plan and make these available to those concerned with a view to refusal prior to action and penalties must be enforced for infringement; not affect current levels of access and supply services; and ensure that works will not destabilise historic mineral working.

The local drainage system in Lumphinnans area is insufficient, development needs to demonstrate that new drainage systems can be provided to the satisfaction of key agencies. Development will create a loss in infrastructure capacity, the local Primary Schools are inadequate for current needs irrespective of addition of 800 houses and additional housing will place a further strain on local roads, NHS resources and community facilities. Concerned that there are not systems in place to encourage new employment options such as manufacturing and that Lochgelly will become more of a server town for Dundee and Edinburgh.

Anne R & Christopher Leivesley (943), James Blyth (992), P Gonnella (998), Sarah Daly (1002): The framework diagram for Lochgelly West appears to integrate the farm road as part of new development, this road is owned by Lumphinnans Farm and cannot be used as any part of any development: vehicular or other. The proposals shows enhanced
footpaths and cycle routes, parks and leisure facilities, as this is a working farm there are concerns over the safety of these proposals. These proposals could also damage areas of archaeological interest; any pathways should be re-routed to avoid the farm and the built heritage.

Louise Stevens (1470): Pipelines run under Proposal LGY 007, and there is Japanese knotweed in the vicinity. The additional housing would be within the 2km of Little Raith Wind Farm exposing the new residents to health risks. In addition emergency evacuation and health risks in relation to Mossmorran are of concern.

Strawson Holdings Ltd (1897): Support proposal LGY 007 but object to the designation of part of Lochgelly South as an amenity buffer, this designation is premature and unexplained. The preparation of a masterplan is a more appropriate vehicle for identifying areas of greenspace or amenity buffers.

Hendersons Chartered Surveyors (1741): Support the identification of Lochgelly West; confirm that the site is effective and that discussions are ongoing with developers.

Hargreaves (2786): The opportunity to recover the shallow coal deposit prior to, or as an integral part of, the development be recognised to prevent unintentional sterilisation.

A.M Sharp (3391): The proposals for Lumphinnans are taking away from the Lochgelly quota. Development proposed is within the danger zone of the petro chemical plant at Mossmorran, no development should be within 2km of this plant, pollution from the plant and the A92 are of concern. No development should take place within 2km of the wind farm. Shallow workings and coal deposits would need to be opencast. Pipelines cross part of the site protecting parts of the site from development. Land should be identified for a cemetery extension. The land to the north of Lochgelly is stable and suitable for residential development; the Lochgelly Charrette supported development in this area.

NHS Fife (3855): Housing allocations in the Lochgelly area could impact on healthcare services, further discussions with NHS Fife are advised.

SEPA (3553): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site and the requirement for a buffer strip along the watercourse to help protect and improve the water environment.

LGY 008 – Former Fab-Tek site, High Street

Omnivale Ltd (1884): Omnivale Ltd supports the allocation LGY008 for Classes 1 (retail) and 9 (houses)

LGY 012 – Launcherhead Park

Peter Ward (699): Object to proposal LGY012. The current station could be renovated to meet future requirements rather than developing on a greenfield site that is currently used by the local community.

Transport Scotland (3228): Transport Scotland is unaware of the current plans or timetable for this scheme and agreement has not been reached on the inclusion of proposal LGY 012 within the Proposed Plan. A robust and appropriate appraisal has not been undertaken that has successfully concluded that closing the existing station and
constructing a new rail station is a viable and deliverable transport option at this location. Until such time that this has been undertaken it is recommended that the wording for LGY 012 on page 141 is altered.

COUNTRYSIDE AREA

LWD 009 – Westfield Green Business Park

Hargreaves (2058): Support the allocation of site LWD 009. Hargreaves would welcome the widening of the existing designation by the inclusion of inert landfilling associated with the waste resource recovery that will enable the partial remodelling of the existing site topography creating additional development opportunities.

LWD 020 – Mossmorran potential expansion

Shell UK Ltd (504): Request that the proposal should be amended to make reference to the pipeline consultation zones running through this area and any proposed developments should accord with the advice of the Health and Safety Executive (HSE).

SEPA (3567): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site and the requirement for a buffer strip along the watercourse to help protect and improve the water environment.

Countryside Issues

Hargreaves (2791, 2055): objects to the non-inclusion of the opencast site at St Ninian’s, Loch Fitty, for mixed use (tourism and leisure) on the basis that: discussions had been ongoing with Fife Council around masterplanning and after-use of the opencast site; the Key Changes document does not mention the site; and there is no reasoned justification given for the site’s non-inclusion.

Jacobs (1205): In line with Scottish Planning Policy, the proposed Blairadam Wind Farm site is outwith Group 1 and 2. The Blairadam site is within a Group 3 area and accordingly the FIFEplan must acknowledge that wind farm development is acceptable in principle at this site.

Margaret Hall (3910), Cheryl Wilson (3911), Ann Wilson (3912), James Wilson (3913): If the open cast site at Loch Fitty is resurrected and the proposed drainage of the loch takes place, this could result in a serious destabilising effect on the surrounding land and loss of a large outdoor leisure area for the community.

Settlements with No Proposals

Thomas Kinnaird (1935): objects to the non-inclusion of a site for housing at Cluny Farm (candidate site ref LDP-CLU001), adjacent to the Cluny settlement boundary, the development of which is considered to be a logical extension to the village to assist in meeting the housing land requirement, in line with Scottish Government policy that such rural developments are generally acceptable.
<table>
<thead>
<tr>
<th>Modifications sought by those submitting representations:</th>
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<tbody>
<tr>
<td>BALLINGRY, LOCHORE, CROSSHILL &amp; GLEN CRAIG</td>
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<td>BALLINGRY</td>
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<tr>
<td>BGY 002 – Land to the east of Ballingry</td>
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<td>Scottish Environment Protection Agency (3251): Request inclusion of a buffer strip requirement to be added to the development requirements for this site.</td>
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<td>LOCHORE</td>
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<td>J Lochead (509): Request the following wording change to the Development Requirements:</td>
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<tr>
<td>First paragraph. Add a new sentence at the end of the paragraph.&quot; However, there is flexibility in the exact location of both the location of the housing land and community open space given the potential restrictions imposed by the nearby pipeline&quot;</td>
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<tr>
<td>Second paragraph. Add additional sentence. &quot;There is the opportunity to provide two vehicular access points from New Flockhouse.&quot;</td>
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<td>COWDENBEATH, HILL OF BEATH &amp; LUMPHINNANS</td>
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<td>COWDENBEATH</td>
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<tr>
<td>Cowdenbeath Issues</td>
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<td>Marise Sinclair (1430): To resolve the issue, we would like to suggest that the Green Network Boundary (shown in grey shading on Map 1 and a green broken line on Map 2) is re-routed from the B981 down the west side of the Cowdenbeath Community Woodland which lies north of the live rail route, then along the whole of the south-east boundary of same continuing parallel to the northern boundary of the railway corridor to include the small section leading along the south-east boundary of Woodend Industrial Estate, the community woodland and this section already being part of the existing Green Network. Another boundary denoting Green Network areas could then be shown to include all of the green areas lying east of Fordell Industrial Estate.</td>
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<td>COW 009 – Woodend Business Centre</td>
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<td>Lanscots Developments Ltd (1927): Request that the site zoning is changed back to an Area of Mixed Use as per the adopted Mid Fife Local Plan.</td>
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<td>LUMPHINNANS</td>
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<tr>
<td>LPH 001 – Lochgelly Road</td>
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<tr>
<td>Moray Estates Development Company (1882): Request that the policy requirement to improve existing road access be removed.</td>
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KELTY

Kelty Issues

John Collier & Sons (972 & 974): Request inclusion of sites (Candidate site ref LDP-KEL004 & LDP-KEL005).

Lomond Group (3734): Request inclusion of site (Candidate site ref LDP-KEL002).

KEL 005– Kelty South West

Gillian Temple (601), Ian Westwater (1076), William Kirkhouse (1459): Request deletion of this site.

KINGSEAT

KST 001– Kingseat Road

John & Marilyn Penman (429), Robert Hutchinson (423), Andrew R Duff (396), Watson Wilson (397), Walter Sinclair (401), W H Ramsay (406), T Hogg (410), A Spowart (412), Stewart Gunn (413), Steven Liddle (415), Alexander Lees (418), Sheena Keenan (419), Sandra Stothard (421), Alexander Whyte (426), S R Hutchinson (427), Sheila Colville (430), Allyson Fawcett (435), R Stuart (431), R R H Dacre (436), Andrew Penman (441), Anne Clayton (452), R Miller (445), R Kerr (448), Robin Todd (449), Peter McNamee (450), Peter Fawcett (454), Paula Gregory (456), Owner Occupier (458), Malcolm Hall (459), Leslie Smith (489), Margaret Heawood (469), Michael Scanlin (461), Margaret Smith (468), Margaret Crawford (472), Malcolm MacKay (477), M Stewart (480), M Shread (481), M Spencer-Bowles (487), M Hogg (488), Lesley Brookes (492), June Greig (546), Wilma Donaghy (494), K Donaghy (496), Laura Wiseman (498), Laura Maconachie (521), Kathleen Campbell (523), Joan Spowart (526), Jeff Wiseman (528), Janette Wiseman (531), Jacqueline Welsh (533), Janet Fisher (535), J Whyte (536), Julie Millar (538), J McLure (541), J M Stothard (543), Ian Todd (545), Helen McLure (548), Grace Scanlin (550), George Campbell (552), Forbes N Stuart (556), Fiona Dacre (558), Elizabeth Kerr (559), E A Lamond (561), Duncan Fisher (563), Dorothy M Johnstone (564), Doreen Esnol (565), Donald Gregory (569), Dawn Proudfoot (579), Mr & Mrs A Stewart (573), B Hamilton (574), B W Glover (581), Claire Richardson (582), Claire Henderson (584), Claire Beurskens (586), Carol Smith (588), C Lees (590), C Crawford (592), Brian Crawford (594), Allan & Margaret Stewart (687), Barbara Sands (599), Margaret Bingham (1133), L Bingham (1131), Colin R White (1113), Mr & Mrs A Marshall (1136), Muriel Nicol (1140), Robert Nicol (1143), Kenneth Coles (1263), M R Grant (1267), Karen Galbraith (1943), D Keningale (2373), Ean Galbraith (2397), Norman Woolley (2406), Patricia Woolley (2414), Owner Occupier (3866), David Peat (110), Ethel C Marsh (125), Marion Peat (198), Eagle Glen Residents’ Association (209), Kingseat Community Council (357), June Simpson (814), Margaret Hall (1348), Arthur Sutton (1410), Cheryl Wilson (1775), Ann Wilson (1784), James Wilson (1786), Kathy Chesher (15), E G Whale (133), R Keningale (3926): Remove proposal KST001 Kingseat Road from the Proposed Plan.

SEPA (3256): Include a Flood Risk Assessment (FRA) as a site specific developer requirement for KST 001 Kingseat Road.

John Hutcheson (1163): Allocate land at Cuddyhouse Road, Kingseat for circa 30
residential units.

Taylor Wimpey (877): Increase site capacity of proposal KST 001 Kingseat Road to greater than 50 units (no alternative capacity submitted).

**LOCHGELLY**

**LGY 004 – West Cartmore**

Persimmon Homes (1985): This site should be de-allocated or have the programming pushed back a significant number of years to allow the market to pick up.

**LGY 007 – Lochgelly Strategic Development Area**

Anne R & Christopher Leivesley (943), James Blyth (992), P Gonnella (998), Sarah Daly (1002), Louise Stevens (1470): The development requirements should address the following: appropriate screening and separation distances should be put in place for the existing cottages; a developer representative should be provided; deviations from the plan must be agreed with those affected; current levels of access and supply must not be affected; works must not destabilise historic mineral workings; and acceptable drainage systems must be provided.

Anne R & Christopher Leivesley (943), James Blyth (992), P Gonnella (998), Sarah Daly (1002): Any pathways proposed for LGY 007 (Lochgelly West) should be re-routed to avoid the farm and the built heritage.

Strawson Holdings Ltd (1897): The amenity buffer identified within Lochgelly south should be deleted.

Hargreaves (2786): The development requirements should highlight the opportunity to recover the shallow coal deposit to avoid unintentional sterilisation.

A M Sharp (3391): Remove Lochgelly south and west from Proposal LGY 007. Identify land adjacent to the cemetery for cemetery expansion.

**LGY 012 – Launcherhead Park**

Transport Scotland (3228): The following changes to this proposal should be made:

Under the ‘Description’ heading change to;

“Undertake an appropriate assessment of transport options in Lochgelly ”

In the text box include the wording;

“An appropriate assessment requires to be undertaken to investigate the viability and deliverability of providing a relocated rail station based on STAG principles. A robust business case will follow dependent on the outcomes of the appropriate assessment. Notwithstanding this, Transport Scotland currently has no plans to fund or deliver a station at this location and an alternative source of funding will require to be identified. Discussion and agreement with Transport Scotland and Network Rail is required.”
COUNTRY SIDE AREA

LWD 009 – Westfield Green Business Park

Hargreaves (2058): Hargreaves would welcome the widening of the existing designation by the inclusion of inert landfilling associated with the waste resource recovery that will enable the partial remodelling of the existing site topography creating additional development opportunities.

LWD 020 – Mossmorran potential expansion

Shell UK Ltd (504): Request that the proposal should be amended to make reference to the pipeline consultation zones running through this area and any proposed developments should accord with the advice of the HSE.

Countryside Issues

Hargreaves (2791, 2055): Request inclusion of the opencast site at St Ninian’s, Loch Fitty, for mixed use (tourism and leisure)

Settlements with No Proposals

Thomas Kinnaird (1935): Request inclusion of site in Cluny.

Summary of responses (including reasons) by planning authority:

BALLINGRY, LOCHORE, CROSSHILL & GLEN CRAIG

BALLINGRY

Ball ingry Issues

NHS Fife (3835): Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision.

BGY 002 – Land to the east of Ballingry

SEPA (3251): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken is noted. Fife Council considers that there is merit in including the request for inclusion of a buffer strip requirement to be added to the development requirements for this site and invites the Reporter to make an appropriate recommendation on this issue.

BGY 004 – Former Benarty Centre

SEPA (3307): Support noted
LOCHORE

LHR 001 – Capledrae Farm

J Lochead (509): Support for continued allocation of site LHR001 is noted. Fife Council considers that there is merit in accepting the modification requested for this site to provide the flexibility required with regards to the layout of the development and open space and invites the Reporter to make an appropriate recommendation on this issue.

LHR 003 – Loanhead Avenue & LHR 004 – Lochore Meadows

SEPA (3554 & 3556): Support noted

CROSSHILL

CRH 001 – Former Meedies Neuk Bar

SEPA (3344): Support noted

GLENCRAIG

GLC 001 – Glencraig East

SEPA (3404): Support noted.

CARDENDEN, DUNDONALD, AUCHTERDERRAN & BOWHILL

Cardenden Issues

NHS Fife (3838): Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision.

CDD 001 – Bowhill Colliery

Cardenden Community Council (66): Comments noted

SEPA (3314): Support noted.

CDD 002 – Cardenden South

SEPA (3316): Support noted.

CDD 003 – Dundonald South

Miller Parkgate Ltd (965), Bracken Lea Homes Ltd (in receivership) (1506): Support for continued allocation of site CDD003 is noted.
CDD 004 – Cardenden Road East

Cardenden Community Council (67): Fife Council has a statutory duty to ensure that the FIFEplan Local Development Plan (LDP) (CD5) conforms to the SESplan Strategic Development Plan (CD2) before it can be adopted. The Council must maintain at least a 5 year effective housing land supply in the Kirkcaldy, Glenrothes and Central Fife Housing Market Area, and the Local Development Plan should identify sufficient sites to meet the housing land requirement for 10 years as detailed in the SESplan Strategic Development Plan (CD2). Cardenden is a settlement within the Strategic Development Area of a scale which is capable of accommodating strategic scale development or medium scale development. The site fits in with the existing character, scale and form of a settlement. It has good integration into town and is in close proximity to services - train station, shops.

Barratt David Wilson Homes (1342): Support of allocation of site CDD004 is noted. Fife Council has a statutory duty to ensure that the FIFEplan Local Development Plan (LDP) (CD5) conforms to the SESplan Strategic Development Plan (CD2) before it can be adopted. The Council must maintain at least a 5 year effective housing land supply in the Kirkcaldy, Glenrothes and Central Fife Housing Market Area, and the Local Development Plan should identify sufficient sites to meet the housing land requirement for 10 years as detailed in the SESplan Strategic Development Plan (CD2). Cardenden is a settlement within the Strategic Development Area of a scale which is capable of accommodating strategic scale development or medium scale development. The site fits in with the existing character, scale and form of a settlement. It has good integration into town and is in close proximity to services - train station, shops.

Marie Buckleygray (2339): Fife Council has a statutory duty to ensure that the FIFEplan Local Development Plan (LDP) (CD5) conforms to the SESplan Strategic Development Plan (CD2) before it can be adopted. The Council must maintain at least a 5 year effective housing land supply in the Kirkcaldy, Glenrothes and Central Fife Housing Market Area, and the Local Development Plan should identify sufficient sites to meet the housing land requirement for 10 years as detailed in the SESplan Strategic Development Plan (CD2). Cardenden is a settlement within the Strategic Development Area of a scale which is capable of accommodating strategic scale development or medium scale development. The site fits in with the existing character, scale and form of a settlement. It has good integration into town and is in close proximity to services - train station, shops. The Development Requirements for this site set out that this site has to deliver landscape and habitat enhancements through its development. Detailed matters, such as the specifications of road access and drainage arrangements and impact on wildlife, will be dealt with at planning application stage.

SEPA (3317): Support noted.

CDD 005 – Cardenden Road West

Marie Buckleygray (2338): Fife Council has a statutory duty to ensure that the FIFEplan Local Development Plan (LDP) (CD5) conforms to the SESplan Strategic Development Plan (CD2) before it can be adopted. The Council must maintain at least a 5 year effective housing land supply in the Kirkcaldy, Glenrothes and Central Fife Housing Market Area, and the Local Development Plan should identify sufficient sites to meet the housing land requirement for 10 years as detailed in the SESplan Strategic Development Plan (CD2). Cardenden is a settlement within the Strategic Development Area of a
scale which is capable of accommodating strategic scale development or medium scale development. The site fits in with the existing character, scale and form of a settlement. It has good integration into town and is in close proximity to services - train station, shops. The Development Requirements for this site set out that this site has to deliver landscape and habitat enhancements through its development. Detailed matters, such as the specifications of road access and drainage arrangements and impact on wildlife, will be dealt with at planning application stage.

SEPA (3318): Support noted.

CDD 006 – Woodend Road

Cardenden Community Council (68): The principle of development was set here through the adopted Mid Fife Local Plan (CD7). This site has attracted developer interest in the past through planning application 11/01115/FULL.

Hendersons Surveyors (1561): Support for the continued inclusion of this site is noted.

SEPA (3319): Support noted.

CDD 007 – Cardenden Road

SEPA (3319): Support noted.

CDD 008 - Bowhill Colliery & CDD 009 – Auchterderran Centre

Cardenden Community Council (69 & 70): Comments noted.

SEPA (3319 & 3322): Support noted.

COWDENBEATH, HILL OF BEATH & LUMPHINNANS

COWDENBEATH

Cowdenbeath Issues

Marise Sinclair (1430): The boundary of the Hill of Beath to Lochgelly Green Network is a fairly arbitrary line that just encloses the green network assets and opportunities that have been identified for that green network, hence the slight difference in the boundary lines shown on the two maps provided by AFR (Dunfermline) Ltd (1430). The line of the boundary could be altered as suggested without affecting the integrity of the Hill of Beath to Lochgelly Green Network as there are no green network assets or opportunities identified on the land they would like removed.

For clarification green networks can include assets that have a habitat/landscape/drainage function which do not have public access – these elements still form part of the wider green network performing important landscape, habitat and drainage roles (see LDP glossary CD5 page 252). Maintaining and enhancing the connectivity of green networks is a key priority of FIFEplan. In addition industrial estates across Fife have been identified as including green network assets as part of their landscaping and drainage provision. Designation as employment land does not mean that a site will not include elements that are an important part of a green network.
NHS Fife (3839): Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision.

COW 001 – Beath Glebe

SEPA (3335): Support noted

COW 002 – King Street 2

Persimmon Homes (1968): the 2014 Housing Land Audit (CD11) provides the up to date position with regards the phasing of housing numbers, the number of completed houses on this site and how many units are remaining.

COW 003 - Leuchatsbeath

Persimmon Homes (1969): the 2014 Housing Land Audit (CD11) provides the up to date position with regards the phasing of housing numbers, the number of completed houses on this site and how many units are remaining.

COW 004 – Adjacent gas works, COW 005 - Rosebank, COW 006 – Glenfield Industrial Estate

SEPA (3336, 3337 & 3339): Support noted

COW 009 – Woodend Business Centre

Lanscots Developments Ltd (1927): The Fife Employment Land Strategy (FELS) (CD18) sets out the essential elements required to ensure that an adequate supply of available employment land is provided in Fife. The Fife Employment Land Strategy is based on the focused drive of the Scottish Government, through economic strategy and planning policy at national, regional and local level, to create sustainable economic growth. In order to ensure Fife Council contributes to this aim, facilitating an effective supply of available land for employment is one of our important economic development functions.

An adequate employment land supply allows businesses to grow, invest and create jobs. The provision is therefore important in terms of the quantity of land available, but it is also essential that the supply provides for a wide range of quality offering a breadth of choice, and that it is located in the right places to meet the needs of employers and communities alike, as indicated in Scottish Planning Policy (2014) (CD1). The Fife Employment Land Strategy (FELS) (CD18) approved by Fife Council in 2014 complements FIFEplan ensuring that Fife maintains adequate employment land across key settlements. It provides additional detail on employment sites including use classes.

COW 011 – North End Park & COW 012 – High Street Gap site

SEPA (3340 & 3342): Support noted
LUMPHINNANS

LPH 001 – Lochgelly Road

Moray Estates Development Company (1882): Support for the continued inclusion of this site is noted. Detailed matters, such as the specifications of road access, will be dealt with at planning application stage.

SEPA (3557): Support noted

LPH 003 – Land to the north of Lumphinnans

Hargreaves (2789): Policy 15 (page 247 of LDP) deals with minerals sterilisation and states that prior extraction of minerals should be facilitated and encouraged for any substantial new development site, in line with national policy.

SEPA (3558): Support noted.

KELTY

Kelty Issues

Jean Hogg (23), George Hogg (25), John Miller (35), Jean Miller (36), James Harley (37), Catherine & Michael Gibson (38), Paul McDonald (109), David Wilson (120), A Murray (220), Michael Murray (221), Linda Gray (232), Eddie Gray (234), Marina Wilson (238), Andrew Ednie (315), Ann Duff (316), C Rettie (317), Carol Hackett (318), David Fernie (319), Elizabeth Carr (320), Freya Riach (321), Ian D Gordon (323), J Duncan (324), James Lamond (326), Janet Fernie (327), John Duffy (328), Joseph Hill (329), Mary and David Sinclair (330), A Harley (331), Jordan Hailstones (332), Keiron Bayne (333), Mr & Mrs J Philip (335), Mr & Mrs M J Boyle (336), Mr & Mrs T Hailstones (338), Ann Lamond (340), April Hailstones (341), E Hall (342), E Harley (343), Isa Duffy (344), Janet Alexander (345), N Young (346), Yvonne McDonald (347), Shana Robertson (349), Agnes Ednie (348), Colin Stark (387), Dr Asim & Ann Azfer (388), Edward Wright (389), Eleanor Lillicrapp (390), Julie Stark (391), Karla - Jane Hill (400), Linda Smith (402), Margaret Adams (404), Mr & Mrs Bernie Richardson (407), Mr & Mrs E Lindsay (409), Mr & Mrs P McArthur (411), Gary Adams (414), Jim Harley (434), Mr & Mrs Lowe (438), Paul Martin (439), William Adams (442), A Lawrie (443), Tracey Wright (444), Neil Cameron MacKay (460), Nicole Carle (463), R Lillicropp (465), Ruth Newell (466), Clifford Smith (467), Thirza Harley (475), Zoe Morris (476), Jane Maclntosh (479), Angela Lister (577), John Lister (578), Owner Occupier (794), A Watson (1126), A Gordon (1275), Ann Hill (3922), A Duff (3923), L Smith (3924): Support inclusion of site KEL 005 is noted

Support for non-inclusion of candidate sites LDP-KEL004 & 005 is noted.

John Collier & Sons (972 & 974): Fife Council’s Executive Committee at its meeting on 9th September 2014 resolved to delete candidate sites LDP-KEL004 West of Woodend Place & LDP-KEL 005 North East of Kelty off Black Road from the Proposed Plan (CD23).

The allocation of these sites was supported by officers. The site was proposed for residential development as part of the Ore/Upper Leven Valley Strategic Development
Lomond Group (3734): The site has not been allocated as its development would not comply with the strategy of the Proposed Local Development Plan as there are more effective housing sites available within the settlement. The adopted Local Plan already identifies a number of housing sites of varying sizes in the area. These have been augmented by an additional large scale effective site to the south of Kelty. It is considered that these allocations meet the requirement at the present time and provide a good range of locations and site sizes within the area.

NHS Fife (3848): Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision.

KEL 004 – Netherton Farm & KEL 008 – Old Gas Works

SEPA (3523 & 3526): Support noted.

KEL 005 – Kelty South West

Gillian Temple (601), Ian Westwater (1076), William Kirkhouse (1459): Fife Council has a statutory duty to ensure that the FIFEplan Local Development Plan (LDP) (CD5) conforms to the SESplan Strategic Development Plan (CD2) before it can be adopted. The Council must maintain at least a 5 year effective housing land supply in the Dunfermline and West Fife Housing Market Area, and the Local Development Plan should identify sufficient sites to meet the housing land requirement for 10 years as detailed in the SESplan Strategic Development Plan. Kelty is a settlement within the Strategic Development Area of a scale which is capable of accommodating strategic scale development or medium scale development. Property value is not a material planning consideration. Issues relating to the amenity of existing residents such as noise, nuisance, smell, privacy, daylight etc. would be addressed at the detailed planning application stage. The site is not 'prime' agricultural land, in terms of the James Hutton Institute Agricultural Land Classification, and is therefore not subject to the terms of Scottish Planning Policy (2014) (para 80) (CD1) which seeks to protect prime agricultural land.

Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision.

SEPA (3524): Support noted.
PROPOSED FIFE LOCAL DEVELOPMENT PLAN

KINGSEAT

KST 001– Kingseat Road

John & Marilyn Penman (429), Robert Hutchinson (423), Andrew R Duff (396), Watson Wilson (397), Walter Sinclair (401), W H Ramsay (406), T Hogg (410), A Spowart (412), Stewart Gunn (413), Steven Liddle (415), Alexander Lees (418), Sheena Keenan (419), Sandra Stothard (421), Alexander Whyte (426), S R Hutchinson (427), Sheila Colville (430), Allyson Fawcett (435), R Stuart (431), R R H Dacre (436), Andrew Penman (441), Anne Clayton (452), R Miller (445), R Kerr (448), Robin Todd (449), Peter McNamee (450), Peter Fawcett (454), Paula Gregory (456), Owner Occupier (458), Malcolm Hall (459), Leslie Smith (489), Margaret Heawood (469), Michael Scanlin (461), Margaret Smith (468), Margaret Crawford (472), Malcolm MacKay (477), M Stewart (480), M Shread (481), M Spencer-Bowles (487), M Hogg (488), Lesley Brookes (492), June Greig (546), Wilma Donaghy (494), K Donaghy (496), Laura Wiseman (498), Laura Maconachie (521), Kathleen Campbell (523), Joan Spowart (526), Jeff Wiseman (528), Janette Wiseman (531), Jacqueline Welsh (533), Janet Fisher (535), J Whyte (536), Julie Millar (538), J McLure (541), J M Stothard (543), Ian Todd (545), Helen McLure (548), Grace Scanlin (550), George Campbell (552), Forbes N Stuart (556), Fiona Dacre (558), Elizabeth Kerr (559), E A Lamond (561), Duncan Fisher (563), Dorothy M Johnstone (564), Doreen Esnol (565), Donald Gregory (569), Dawn Proudfoot (579), Mr & Mrs A Stewart (573), B Hamilton (574), B W Glover (581), Claire Richardson (582), Claire Henderson (584), Claire Beurskens (586), Carol Smith (588), C Lees (590), C Crawford (592), Brian Crawford (594), Allan & Margaret Stewart (687), Barbara Sands (599), Margaret Bingham (1133), L Bingham (1131), Colin R White (1113), Mr & Mrs A Marshall (1136), Muriel Nicol (1140), Robert Nicol (1143), Kenneth Coles (1263), M R Grant (1267), Karen Galbraith (1943), D Keningale (2373), Ean Galbraith (2397), Norman Woolley (2406), Patricia Woolley (2414), Owner Occupier (3866), David Peat (110), Ethel C Marsh (125), Marion Peat (198), Eagle Glen Residents’ Association (209), Kingseat Community Council (357), June Simpson (814), Margaret Hall (1348), Arthur Sutton (1410), Cheryl Wilson (1775), Ann Wilson (1784), James Wilson (1786), Kathy Chesher (15), E G Whale (133), R Keningale (3926):Fife Council has a statutory duty to ensure that the FIFEplan Local Development Plan (LDP) (CD5) conforms to the SESplan Strategic Development Plan (CD2) before it can be adopted and therefore it is appropriate to review the Dunfermline & West Fife Local Plan 2012 (CD8) which does not conform to SESplan. The Council must maintain at least a 5 year effective housing land supply in the Dunfermline & West Fife Housing Market Area, and the Local Development Plan should identify sufficient sites to meet the housing land requirement for 10 years as detailed in the SESplan Strategic Development Plan.

Supplementary guidance for housing land in the SESplan area (CD3) determines the scale of the housing requirements to be met in the SESplan area through new housing land allocations in the Local Development Plan for the period up to 2026 (see Issue 2b and supporting paper)

Allocating a generous supply of land for housing across the Housing Market Areas in the Local Development Plan gives the flexibility necessary for the continued delivery of new housing should unpredictable changes to the effective housing land supply occur during the lifetime of the Local Development Plan.

Development of this site is consistent with the SESplan strategy. The site could contribute 50 houses towards meeting the SESplan housing land requirement. Detailed
matters would be dealt with at planning application stage, as indicated below.

Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies in infrastructure have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision, for example, new schools.

Issues relating to the amenity of existing residents such as noise, nuisance, smell, privacy, daylight etc. will be considered at planning application stage. This stage would also include further details of a proposal, including traffic management, road access, parking and any site investigations required, including ground stability. This settlement table (CD5 page 109) includes a Transport Assessment as a Development Requirement which will identify measures and interventions required to make the development proposal acceptable in terms of traffic impact. Specific requirements are also detailed in relation to vehicular and pedestrian access and pedestrian links with Kingseat.

A Strategic Transport Assessment (STA) is being commissioned to look at wider impacts on the trunk road network. The STA has been arranged in discussion with Transport Scotland and with input from Transportation and Environmental Services. It is expected that the information from this will inform development obligations and should be available ahead of the Plan Examination in 2015.

The design of the proposal, including site layout and number of houses would be progressed at the planning application stage. Proposed Local Development Plan policies 1: Development Principles, 10: Amenity and 14: Built and Historic Environment will assist the decision making process on planning applications by protecting existing amenity and ensuring that development proposals meet the ‘six qualities’ of well-designed and successful places as set out in Scottish Planning Policy (2014).

It is acknowledged that the development of this site would change the nature of the approach to Kingseat, would impact on the connection of the village with its landscape setting on its southern edge and would also be visible in more distant views. However, these issues are addressed with appropriate mitigation and the development requirements for the site include Green Network Priorities requiring:

- consideration of the visual impact of the development on key views and on the setting of Kingseat to ensure that views are retained;
- new greenspace is provided;
- and a high quality development and landscape edge is delivered.

Site investigations may be required at the planning application stage and will address issues such as the small part of the site being within the Health and Safety Executive pipeline consultation zone and the need for a coal mining risk assessment. These issues have been addressed during the site assessment process.

The site is not ‘prime’ agricultural land, in terms of the James Hutton Institute Agricultural Land Classification, and is therefore not subject to the terms of Scottish Planning Policy (2014) (para 80) (CD1) which seeks to protect prime agricultural land.
Issues relating to vandalism are too detailed for consideration in the Development Plan. Crime prevention is a material planning consideration and any particular land use issues related to the proposal would be taken into account at the planning application stage.

Comments relating to incorrect site plans and building on the Loch Fitty open cast site are noted. If the Loch Fitty open cast proposal is resurrected, it will be subject to relevant planning conditions.

Taylor Wimpey (877): The Settlement Plans indicate an ‘estimated site capacity’ for allocated sites, which allows for this to be varied as a development proposal is progressed for this site. Proposal KST 001 has an estimated site capacity of 50 units. A future planning application must meet with Plan Policies, including Policy 1: Development Principles and Policy 2: Homes. Policy 2 indicates that where applications propose changes to vary capacities by greater than 20% they will be treated as potentially contrary to the Plan (to be considered in terms of Policy 1, part A2.) There is therefore potential to increase the site capacity, subject to compliance with other Plan policies, without the proposal being considered contrary to the Plan. If the capacity is exceeded by greater than 20%, Policy 1, Part A 2. may, otherwise, support a proposal. There is no need to change to ‘estimated site capacity’ for KST 001 in the Settlement Plan.

Scottish Environment Protection Agency (3256): The proposed Plan’s policies 1 (Development Principles) and 12 (Flooding and the Water Environment) set out adequate policy coverage to ensure a Flood Risk Assessment is required at the planning application stage for any development located in or adjacent to the functional flood plain or an area of known flood risk, compliant with Scottish Planning Policy. A Flood Risk Assessment has been included in the Development Requirements for other sites included in the Plan. Consistent presentation of the need for a Flood Risk Assessment would be beneficial to the presentation of the Plan and provide an early alert to a future developer.

Taking all of this into account, Fife Council considers that there is merit in the reference to a requirement for Flood Risk Assessment being included in the ‘development requirements’ for KST 001 in the Kingseat Settlement Plan (using the text ‘A Flood Risk Assessment requires to be undertaken prior to development on this site’, and invites the Reporter to make an appropriate recommendation on this issue.

John Hutcheson (1163): The Proposed Local Development Plan allocates land for housing across the Dunfermline & West Fife Housing Market area, sufficient to meet statutory requirements.

Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with under the Homes Schedule 4 (2B) and its associated supporting paper. All sites identified for housing development in the Proposed Local Development Plan have been the subject of site assessments (CD 15) and public consultation.

The submitted site at Cuddyhouse Road, Kingseat, has been reduced in size following earlier consultation on the Proposed Plan Development Strategy, and its development, with appropriate mitigation, would have a reduced impact in terms of settlement form and landscape. However, the Proposed Plan already identifies a preferred housing site in Kingseat (KST 001) which meets the local requirement for housing land at the present
time. Additionally, the Scottish Environment Protection Agency has highlighted co-
location issues with the Cuddyhouse Road site and its close proximity to pig farms,
licensed by the Scottish Environment Protection Agency, and had recommended that the
earlier submitted site at Cuddyhouse Road should not be allocated for residential or
other sensitive uses. The currently submitted site is the closest part of the site in relation
to the pig farms.

**LOCHGELLY**

**LGY 004 – West Cartmore**

Persimmon Homes (1985): This site is zoned as a Housing Opportunity site and is
phased from year 2020 onwards in the 2014 Housing Land Audit (CD11) so it is already
phased as a long term site.

**LGY 007– Lochgelly Strategic Development Area**

David Kinnell (80), Shell UK Ltd (503), Anne R & Christopher Leivesley (943), James
Blyth (992), P Gonnella (998), Sarah Daly (2002), Louise Stevens (1470), Anne R &
Christopher Leivesley (943), James Blyth (992), P Gonnella (998), Sarah Daly (2002),
Louise Stevens (1470), Strawson Holdings Ltd (1897), Hendersons Chartered Surveyors
(1741), A.M Sharp (3391): Given the history of coal mining around Lochgelly it is
understood that ground conditions will be a factor in determining where development can
take place. To date a number of desk top studies have been undertaken which have
identified areas likely to be impacted by previous mining works. As work progresses on
more detailed proposals more intrusive surveys will be required to ascertain specific
ground condition issues so that these can be addressed appropriately.

The proposal to develop land to the west of Lochgelly as part of proposal LGY 007 has
been brought forward from the adopted Mid Fife Local Plan (CD7). It is considered that
the development requirements for Proposal LGY 007 and the Policies in FIFEplan (CD5)
will protect the quality of life of the residents of the surrounding communities. Planning
consents for the development of Proposal LGY 007 will include specific conditions to
address potential issues that could occur during the construction process.

Council Services such as Transportation and Education, along with external partners
and organisations such as NHS Fife and Scottish Water, have been consulted
throughout the development planning process. Where potential deficiencies have been
identified, in some cases enhanced or upgraded provision has already been planned for
as a result of Local Development Plan allocations while, in others, there will be "on-
demand" provision or upgrades to existing provision. Detailed matters, such as the
specifications of road access and drainage arrangements for example, will be dealt with
at planning application stage.

A significant amount of new employment land has been allocated to the east of
Lochgelly as part of the Strategic Development Area. Work is progressing on delivering
employment uses on this land which will provide additional employment in the Lochgelly
area.

The owner of the development land at Lochgelly west has confirmed that the access
road from Viewfield Terrace to Lumphinnans Farm is within their ownership.
Lumphinnans Farm and the cottages have rights of access and servitude over this route
(SD1 & SD2). Safety issues relating to the working farm, and the archaeological remains would be considered in detail through the planning application process.

The amenity buffer along the southern edge has been included to highlight the importance of providing landscaped mitigation against noise from the A92 and the visual impacts of Little Raith wind farm and Mossmorran. This buffer should be a high quality landscape edge which incorporates an active travel provision as highlighted in the green network priorities for the site. The amenity buffer included on Lochgelly north is to ensure that a high quality landscaped edge is provided towards the Lomond Hills Regional Park.

Scottish Environment Protection Agency and Fife Council Environmental Services have been consulted on this proposal and have raised no objections with regard to proximity to Mossmorran, Little Raith and the A92.

Text has been included within the development requirements for the Strategic Development Area to ensure development within the Health and Safety Executive Pipeline Consultation Zones is of an appropriate use and scale. The Health and Safety Executive will be consulted on any development proposals within the pipeline consultation zones at planning application stage. FIFEplan does not identify any additional land for residential development within the middle or inner pipeline consultation zones.

Hargreaves (2786): Policy 15 deals with minerals sterilisation and states that prior extraction of minerals should be facilitated and encouraged for any substantial new development site, in line with national policy.

NHS Fife (3855): Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision.

LGY 008 – Former Fab-Tek site, High Street

Omnivale Ltd (1884): Support for continued allocation of this site is noted.

LGY 012 – Launcherhead Park

Peter Ward (699), Transport Scotland (3228): Comments noted. The proposal is to safeguard land for the potential upgrading expansion of Lochgelly train station. This was highlighted through the Lochgelly Charrette (SD3) as an opportunity to improve and upgrade the existing station to help with the future growth of Lochgelly.

COUNTRYSIDE AREA

LWD 009 – Westfield Green Business Park

Hargreaves (2058): Comments noted. Fife Council considers that there is merit in widening of the existing designation by the inclusion of inert landfilling associated with the waste resource recovery that will enable the partial remodelling of the existing site
topography creating additional development opportunities and invites the Reporter to make an appropriate recommendation on this issue.

LWD 020 – Mossmorran potential expansion

Shell UK Ltd (504): Comments noted. Fife Council considers that there is merit in amending the Development Requirements for this site to take cognisance of the consultation pipeline running through this site and invites the Reporter to make an appropriate recommendation on this issue.

SEPA (3553): Support noted.

Countryside Issues

Hargreaves (2791, 2055): Comments noted. This site wasn’t discussed in the Key Changes document as this reflected change from the adopted Local Plans to the proposed Local Development Plan. At the time of writing the Local Development Plan this site was in the hands of administrators, since then the site has been taken over by Hargreaves. Fife Council now considers that there is merit in allocating this site for mixed use (tourism and leisure) and invites the Reporter to make an appropriate recommendation on this issue.

Jacobs (1205): The Local Development Plan does not allocate sites for windfarms. The Wind Energy Supplementary Planning Guidance sets out areas of search.

Settlements with No Proposals

Thomas Kinnaird (1935): The Proposed Local Development Plan allocates land for housing across the Kirkcaldy, Glenrothes & Central Fife Housing Market Area, sufficient to meet statutory requirements.

Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with under the Homes Schedule 4 (2B) and its associated supporting paper. All sites identified for housing development in the Proposed Local Development Plan have been the subject of site assessments (CD15). Cluny Farm is located within the Ore Valley Strategic Development Area however the size and scale of the candidate site is considered too large for inclusion as a housing allocation. The location of the candidate site (LDP-CLU001) is also considered unsuitable due to the scale and size of the site and the distance from or integration with facilities, services or infrastructure locally.

Reporter’s conclusions (grouped into inset map settlements):

BALLINGRY, LOCHORE, CROSSHILL and GLEN CRAIG

Local healthcare services

1. The council explains there has been continuing liaison with organisations such as NHS Fife during the plan preparation process. However, ongoing discussions with NHS Fife regarding possible impact on healthcare services would no doubt be beneficial. Such discussions can take place irrespective of whether they are mentioned in the plan.
Accordingly, there is no need to alter the proposed plan.

Site BGY 002 Land to the east of Ballingry

2. The council accepts the suggestion by the Scottish Environment Protection Agency that the inclusion of buffer strips along the two watercourses should be added as a development requirement. Scottish Planning Policy says that the planning system should promote protection and improvement of the water environment, including rivers and lochs. Under the Water Environment and Water Services (Scotland) Act 2003, planning authorities have a duty to protect and improve Scotland’s water environment. To accord with these demands, I also agree with the Scottish Environment Protection Agency that it would be appropriate to require provision of the suggested buffer strips.

Site LHR 001 Capeldrae Farm

3. The council accepts the three suggested changes in terms of flexibility to respect the pipeline consultation zone, the potential for two accesses, and the need for buffer zones. I agree that each of the three is justified (see the reference to the water environment in respect of site BGY 002 above) and could provide an improved development. The proposed plan should be altered accordingly.

CARDENDEN, DUNDONALD, AUCHTERDERRAN and BOWHILL

Local healthcare services

4. Again, the council explains there has been continuing liaison with organisations such as NHS Fife during the plan preparation process. However, ongoing discussions with NHS Fife regarding possible impact on healthcare services would no doubt be beneficial. Such discussions can take place irrespective of whether they are mentioned in the plan. Accordingly, there is no need to alter the proposed plan.

Site CDD 004 Cardenden Road East

Note: The council has explained that the location should read “Cardenden Road West”

5. I have noted the council’s explanation that Cardenden is a settlement within the Strategic Development Area identified in SESplan and the allocation at site CDD 004 is intended to contribute to the wider housing land requirement. The community council does not oppose the allocation on this basis but believes the location of the site is such that commercial development would be more suitable. Mrs Buckleygray is concerned about a range of environmental impacts. She has expressed concern about the development of this site in respect of its value as an open area within the built environment along with nature conservation considerations regarding both flora and fauna. It is also claimed that ground conditions are questionable.

6. I can understand that the proximity of the site to employment land to the west, the sewage treatment plant to the northeast and the railway to the southeast could give rise to some concern about potential impact on residential amenity. In these respects, I have noted the submission made by Barratt David Wilson Homes and, in particular, the development framework which includes provision for sustainable drainage incorporating a wetlands area, greenspace network, linear open space with a waterside frontage, a protected wildlife site, and landscaping to elevated boundaries. Although these are
brought forward on an indicative basis, I consider that there is scope for overcoming potential impacts of nearby land uses on residential amenity. Similarly, there is the potential to provide significant environmental mitigation.

7. In the context of the strategic requirements, I accept the site could be developed for housing without over-riding detrimental impacts. I do not consider that there is evidence of the need to extend the adjoining commercial area or that there is a compelling requirement to retain the site for nature conservation. Change will result from the development of the site on what is currently open, agricultural land. However, I believe there is merit in the council’s argument that the site is of a suitable scale and form and would have the ability to integrate with the town, being in close proximity to services and transport links. In this context, the loss of the open aspect is not over-riding and the preservation of views is not usually a planning consideration in such circumstances. In turn, I conclude that allocation CDD 004 should remain unaltered.

Site CDD 005 Cardenden Road West

Note: The council has explained that the location should read “Cardenden Road East”

8. Concern has been expressed about the need for additional houses but the council has explained the strategic context of the allocation of housing land. This matter is examined in more detail under Issue 2(b), Homes. In particular, I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the 5-year effective housing land supply for the SESplan area of Fife. Although I also acknowledge the uncertainties expressed with regard to the level of this shortfall, it is clear that the deletion of housing land would exacerbate the problem. There are also fears about the ability of existing infrastructure to support development. However, the council is aware of the need to ensure that new houses have adequate provision in this respect and has explained that service providers have been involved throughout the plan preparation process.

9. Mrs Buckleygray raises a range of ecological objections to the development of the site. Nevertheless, the land is not the subject of any formal protective designations and I have been provided with no compelling nature conservation reasons why the allocation should be questioned. I note particularly the references to badgers and bats: these species and their habitats are subject to specific legal protection. Accordingly, any proposed development would have to take account of the potential for their presence on the site.

10. It is inevitable that the development of the site would involve a significant change in the character of this currently rural site. However, the “Green Network Priorities” for the site recognise the existing character and the location on the edge of Cardenden. I believe the landscaping and related objectives set out are appropriate and provide the potential for a reasonable level of mitigation.

11. The potential for flooding and subsidence and density are other issues that have been raised but I accept the council’s response that these matters should be addressed when a detailed proposal is being prepared. In any event, the preparation of a flood risk assessment is a stipulated requirement.

12. Although it has been suggested that there was little local engagement with local residents in the presentation of the proposal, matters relating to publicity and consultation have been examined under Issue 1 and the procedures undertaken by the
13. Overall, I conclude there is no requirement to change the provisions of site CDD 005.

Site CDD 006 Woodend Road

14. The site is allocated for residential development in the current Mid Fife Local Plan and, as argued by the council, the principle of development has been established. Indeed, a planning application was submitted in 2011 although I understand that this was subsequently withdrawn.

15. The preparation of the replacement local development plan provides an opportunity to review land use allocations but I have been provided with no compelling arguments to suggest the existing allocation should be deleted. The community council considers the site to be out of scale and I can accept that the estimated capacity of 145 houses is significant. However, in the context of existing and proposed development in the Auchterderran, Cardenden, Dundonald and Bowhill vicinity, I do not believe the potential level of development on this site to be overwhelming.

16. The community council also refers to concern about the access but I have no indication that a suitable access to the site could not be provided. The estimated capacity of the site is significantly below the council’s standard for the maximum number of houses served by a cul-de-sac.

17. On the basis of the foregoing, I conclude allocation CDD 006 is justified.

Site CDD 008 Bowhill Colliery

18. The community council draws attention to the extension of the settlement boundary from that shown in the existing local plan. I accept the extension as logical as it contains a protected employment area. The community council also indicates that part of the area is scheduled for restoration. I believe such activity is likely to be of benefit in improving the site ambience and, in turn, increasing the prospect of attracting employment activities in accordance with the objective of allocation CDD 008. Additional employment would undoubtedly benefit the local economy and the provisions of the proposed plan should therefore be supported. In turn, no alteration is required.

Site CDD 009 Auchterderran Centre

19. The community council draws attention to the listed buildings on the site. There are rigorous statutory provisions to ensure protection for listed buildings and their settings. Policy 14, Built and Historic Environment, is also intended to protect the built and cultural environment and therefore there is no requirement to amend the proposed plan.

COWDENBEATH, HILL OF BEATH and LUMPHINNANS

Local healthcare services

20. Once more, the council explains there has been continuing liaison with organisations such as NHS Fife during the plan preparation process. However, ongoing discussions with NHS Fife regarding possible impact on healthcare services would no
doubt be beneficial. Such discussions can take place irrespective of whether they are mentioned in the plan. Accordingly, there is no need to alter the proposed plan.

Site COW 002 Beath Glebe

21. The construction of this site is well underway. The annual housing land audit provides details on the rate of progress and indicates the number of houses completed along with those remaining. On this basis, no change is necessary.

Site COW 003 Leuchatsbeath

22. The construction of this site is also well underway. The annual housing land audit provides details on the rate of progress and indicates the number of houses completed along with those remaining. On this basis, no change is necessary.

Site COW 009 Woodend Business Centre

23. The site is allocated as an “Area of Mixed Use” in the Mid Fife Local Plan. The text indicates that “To cross-subsidise the refurbishment of the existing industrial facilities in COW08, or the redevelopment of the same for such uses, it is recognised that housing development on part of the site may be required.”

24. The description in the Cowdenbeath, Hill of Beath and Lumphinnans Settlement Plan in the proposed plan is “Employment/Housing”. It is stated that the site “is identified as a Local Development Plan allocation” with “1 ha to be developed for employment Class 4 (business)”. The Inset Map designates the site, known as the Woodend Business Centre, for “Employment” use.

25. I have noted the representations on behalf of Lanscot Developments Ltd, in respect of the availability of and demand for employment land in Cowdenbeath, the attributes of the location of the site by comparison with sites in other nearby towns, the potential impact of development on existing neighbouring uses and the need for private and affordable housing.

26. The council accepts that, overall, Cowdenbeath has an adequate supply of allocated employment land but points out that there is a demand for good quality small units. This demand is not being met by the current supply. The council believes the site has the potential to satisfy some of this demand.

27. In terms of quality, I accept the location does not benefit to the extent of some modern areas of employment land in surrounding settlements. However, I do not believe that location or site disposition serve as an overwhelming constraint to the use of site COW 009 for employment purposes. This would be particularly so in respect of smaller units which, in my experience, often have less demanding locational requirements.

28. The site has established housing to the north, on the opposite side of Woodend Place but, particularly in view of the existing employment uses, I do not consider that the proximity of the employment land allocation represents the introduction of a potentially unacceptable level of incompatibility.

29. I have also noted the location of the Scottish Autism centre and the special needs
care accommodation to the west of the site. The care accommodation site is shown as part of the business centre in the current local plan and as safeguarded employment land in the proposed plan. Although it has been stated that the application for planning permission for the care accommodation was submitted on the basis of the wider mixed development allocation, there was no indication at the time of the precise nature of any future neighbouring uses in the business centre.

30. Whilst I recognise the sensitive nature of both these uses, I also believe that a carefully designed development within the business centre would be able to achieve the level of amenity required and not lead to an untoward intrusion.

31. In any event, in respect of both the residential properties to the north and the special needs uses to the west, the Class 4 specification is significant insofar as the Use Classes Order definition states the use as one “which can be carried on in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.”

32. Despite the suggested need for private and affordable houses (the wider housing context is examined under Issue 2(b), Homes), I do not consider this to be an argument sufficient to justify setting aside the allocation contained in the proposed plan.

33. All-in-all, I conclude that the proposed plan should not be changed in terms of allocation COW 009, Woodend Business Centre.

34. I note the description of the use as “Employment/Housing” is a typographical error and therefore this should be rectified by the council.

Fordell Industrial Estate

35. A new access road and associated path have been constructed from the B981 to the Fordell Industrial Estate. The strips of land to the north and south remain as pasture.

36. The council has explained that the Green Networks 1: 65,000 map provides a general impression of the Green Network across Fife. For further detail, reference should be made to the Interactive Mapping Tool. The Interactive Map shows the land to the east of the Fordell Industrial Estate to be within the Green Network but the industrial estate itself and the land to the west, through which the access road passes, is not included in the Network.

37. Although the blue line boundary of the Green Network appears to impinge on the pasture land through which the new road passes, I am satisfied that the generalised nature of the boundary does not present any threat to the continuing agricultural use of the land. Similarly, the Green Network designation is of no consequence in respect of the continuing use of the industrial estate for employment purposes. In turn, there is no requirement for either the Green Networks 1: 65,000 map or the Interactive Mapping Tool to be adjusted.

38. In respect of the comments on the core path, I note that Network Rail was granted planning permission in 2014 for a replacement bridge including a two-metre-wide footpath. It has been indicated that the existing bridge across the railway line, previously providing access to the industrial estate, would be demolished once the new access road was complete. However, despite the new access road to the industrial estate, the
original bridge remains in place.

39. Matters related to core paths are subject to the provisions of the Land Reform (Scotland) Act 2003. Policy 13, Natural Environment and Access, in the proposed plan, specifies core paths as assets to be protected or enhanced in order to gain the support of development proposals. The Interactive Mapping Tool illustrates core paths.

40. Should the replacement bridge be constructed in terms of the planning permission, the existing route of the core path could remain. However, should there be a need to divert or alter the route of the path in the vicinity of the Fordell Industrial Estate, there is no requirement to change the proposed plan. As indicated, procedure to deal with any such eventuality is prescribed in the Land Reform Act.

Site LPH 001 Lochgelly Road

41. Although the council considers that any access issues should be resolved at the time a planning application is brought forward, Moray Estates Development Company is concerned about the reference in the proposed plan to the improvement of the access. It is believed by Moray Estates that the current access could meet the requisite standards.

42. It appears that there was an agreement some time ago that the existing access would be able to meet the standards although there is no formal confirmation of the council’s acceptance of the situation. In any event, over the years, transport standards guidance can be reviewed and requirements may change.

43. I consider that the proposed plan should not stipulate an improvement to the existing road access as such an improvement would not be justified should the access meet the requisite standard. On the other hand, I believe it is appropriate for a reference to be made to the need to meet the council’s standards. This would ensure that any potential developer is aware from the outset that there is a need to assess the existing access against the current technical standards.

44. Insofar as a secondary pedestrian access is concerned, I note that there is general support in principle. Indeed, the illustrative master plan shows a pedestrian link to the south. Moray Estates has emphasised that the required link cannot be guaranteed because of lack of control over the route the path would follow. I appreciate this problem and note that the proposed plan requires the link to be formed “if practicable”. This is a reasonable approach and recognises that there could be practical difficulties in achieving the required pedestrian link. On this basis, there is no justification for altering the proposed plan.

Site LPH 003 Land to the north of Lumphinnans

45. In response to the request for a reference to the extraction of coal either prior to or as an integral part of development the council has drawn attention to Policy 15, Minerals.

46. I note that the policy states “Prior extraction of minerals should be facilitated and encouraged from any substantial development site.” Site LPH 003 is certainly substantial with an estimated capacity of 300 houses. Whilst I agree that there is policy provision for the extraction of minerals from the site, it would be helpful to include a reference to the potential for exploiting the coal reserve said to be present. An addition
to the development requirements would therefore be appropriate.

**KELTY**

**Local healthcare services**

47. The council explains there has been continuing liaison with organisations such as NHS Fife during the plan preparation process. However, ongoing discussions with NHS Fife regarding possible impact on healthcare services would no doubt be beneficial. Such discussions can take place irrespective of whether they are mentioned in the plan. Accordingly, there is no need to alter the proposed plan.

**Site KEL 005 Kelty South West**

48. This large site of over 46 hectares is proposed for residential, employment, leisure and community uses. The estimated housing capacity of 900 provides a significant contribution towards the housing land requirement contained in SESplan, the strategic development plan with which the local development plan must be consistent. Kelty lies within a strategic development area designated by SESplan to which major new development should be directed. It was decided by the council that allocations of a scale of site KEL 005 would be brought forward to meet strategic requirements. Despite the claim that house sales in both the vicinity and in the wider Fife housing market areas are not strong, I am not persuaded that this provides justification for deleting the allocation.

49. There are concerns about the claimed loss of prime agricultural land, but the council has confirmed that the site does not involve land in this category. Fears about the impact on infrastructure and supporting services are understandable but the council has explained that infrastructure has been taken into account and has liaised with service providers throughout the plan preparation process. I have been provided with no clear evidence that adequate provision would not be available. I note also that Policy 3, Infrastructure and Services, requires new development to be accompanied by the infrastructure necessary to allow communities to function sustainably. Policy 4, Planning Obligations, requires developer contributions where development would have an adverse impact on strategic infrastructure capacity or an adverse community impact.

50. It is also apparent that a site the size of site KEL 005 will generate significant traffic levels and, in this respect also, the council confirms that there has been ongoing consultation with the Transportation Services department. Again, whilst I appreciate the concerns expressed, I have no evidence to rule out the allocation on traffic and transportation grounds.

51. Various objections to the development of the site have been submitted on the basis of layout and design including impact on existing residential amenity through overlooking and the provision of landscaped areas and playing fields. I accept that detailed matters of this nature are properly considered at the time a planning application is being prepared. The council has full scope for the control of these matters through the development management process.

52. As argued by the council, loss of view and property values are not material planning considerations. Although it has been suggested that the proposed development would be detrimental to small, local businesses, this claim has not been substantiated and I am
not persuaded that this would represent a significant problem.

53. All-in-all I conclude that strategic requirements support the allocation of site KEL 005 and that the deletion of the site from the proposed plan is not justified.

Candidate site LDP-KEL002 Seafar Drive

54. Strategic housing matters are considered under Issue 2(b) Homes, of the examination. In this respect, I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the 5-year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under Issue 2(b) Homes with regard to the level of this shortfall. In the context of strategic housing land requirements, as noted by the Lomond Group, a development allocation has been proposed along the southern edge of Kelty as part of a strategic development area (see site KEL 005 above). Having considered representations concerned about this proposed allocation, I have concluded that the designation of the site is justified.

55. The estimated capacity of site KEL 005 is 900 houses and it is clear that this provides scope for the provision of a range of residential accommodation. Although, the Lomond Group has emphasised the specialised nature of care facility proposed at site LDP-KEL002, I see no reason in principle why accommodation of this nature could not be contained within site KEL 005. In turn, I do not believe that there is particular justification for a care facility elsewhere in Kelty.

56. In addition to the foregoing conclusion, I am concerned that the proposed allocation is on a greenfield site beyond the identified settlement boundary. I appreciate that the development of site KEL 005 would involve a very significant settlement expansion and, as explained, this proposal is in accordance with strategic objectives. The care facility would involve a much smaller but nevertheless significant greenfield incursion. The site proposed has been much reduced from an earlier proposal. However, lacking specific locational justification, I do not consider that a settlement expansion at this point is justified. The development would take the built-up area of Kelty beyond clearly defined existing boundaries.

57. All-in-all and regardless of the level of housing shortfall, I find that this site would nevertheless be unacceptable because the adverse impacts identified above would outweigh the benefits of addressing any shortfall. I conclude that the allocation of this land is not justified.

Candidate site LDP-KEL004 Woodend Place

58. Although this site had been included in the proposed plan, it was deleted at an advanced stage in the preparation process. This met with the approval of many and numerous representations have been received endorsing the proposed major development on the southern edge of Kelty (see site KEL 005 above). In turn, the non-allocation of site LDP-KEL004 was supported.

59. John Collier & Sons argues that the site is brownfield on the basis that it was housing land at one time and that traces of development can still be seen. On the other hand, it has been pointed out that the site has been largely used for grazing for some 50 years. Superficially, the site appears to be greenfield in character but it is clear that there has been previous development on the land. This is recognised in the council’s
site assessment. In terms of the definition contained in Scottish Planning Policy the site should therefore be regarded as brownfield. The guidance states that development should be considered on brownfield land before it takes place on greenfield sites.

60. I do not believe that the status of the site as brownfield suggests a housing land allocation as a matter of course. The historical nature of the previous development and the general reversion of the land, at least visually, to virtual greenfield character, must be taken into account.

61. I also acknowledge that the site has been considered at a previous local plan examination and it was determined that the relative distance from the town centre and motorway junction should preclude housing land designation. I accept these to be valid considerations. Certainly, in terms of access to the wider road network, the proposed site at the southern edge of Kelty is advantageously located.

62. There is an access to site LDP-KEL004 via Woodend Place which, presumably, served the housing that was on the site in the past. I note this access is capable of meeting the council’s technical standards. However, I do not consider the access would offer a particularly attractive approach to a prospective housing development and would also detract from the amenity of existing residential property. I also believe that housing on the site would not relate well or demonstrate connectivity with the existing development in the vicinity. In this respect, therefore, development would be somewhat contrived and not in accordance with the principle of place-making where more natural, “organic” growth is to be encouraged.

63. The capacity of the site is about 20 houses which, particularly in the context of the scale of site KEL 005, has little significance in strategic terms. On balance, therefore, I conclude that the land at Woodend Place should not be allocated for residential development and that no change to the proposed plan is required in this respect.

64. In reaching this conclusion, I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the 5-year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under Issue 2b (Homes) with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that this site would nevertheless be unacceptable because the adverse impacts identified above would outweigh the benefits of addressing any shortfall. In any event, very significant provision for housing is already made in Kelty in the proposed plan with the allocation of site KEL 005, Kelty South West (see above).

Candidate site LDP-KEL005 Black Road

65. Although this site had been included in the proposed plan, it was also deleted at an advanced stage in the preparation process. Again, this met with the approval of many and numerous representations have been received endorsing the proposed major development on the southern edge of Kelty (see site KEL 005 above). In turn, the non-allocation of site LDP-KEL005 was supported.

66. Although John Collier and Sons believes the development of the site would represent a natural and logical extension to Kelty I do not consider this to be the case. Whilst the site would, for the most part, be bounded by development, a cul-de-sac access would be required which, whilst not “tortuous”, would not allow the development of the site to relate well to the existing built-up area. In turn, I believe that the
development of the site would not create the level of connectivity required by Scottish Planning Policy to achieve acceptable place-making.

67. Settlement expansion can often require peripheral building and, in turn this can increase the distance between new housing and local services. Indeed, the previous local plan examination report concludes that development in this vicinity would be relatively remote from the town centre. The site is also not convenient for motorway access in marked contrast with site KEL 005 which is adjacent to an interchange with the M90.

68. Overall, Kelty has been recognised as a settlement where a significant contribution to strategic housing land requirements would be possible, the wider housing context having been considered under Issue 2(b), Homes, of the examination. The scale of the site at Black Road is not such as to make a significant contribution to strategic housing land supply. Whilst smaller sites could further broaden the range and choice of housing offered by site KEL 005, I do not consider that the potential contribution of site LDP-KEL005 would offset the disadvantages of the site in townscape terms. I therefore conclude that the site should not be allocated for development and the land should remain beyond the Kelty settlement boundary.

69. In reaching this conclusion, I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the 5-year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under Issue 2b (Homes) with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that this site would nevertheless be unacceptable because the adverse impacts identified above would outweigh the benefits of addressing any shortfall. In any event, very significant provision for housing is already made in Kelty in the proposed plan with the allocation of site KEL 005, Kelty South West (see above).

KINGSEAT

Site KST 001 Kingseat Road

70. The council has explained the context and the need for the proposed plan to identify sites to meet the wider housing land requirement set out in SESplan. On this basis, the site has been identified to make a contribution to the strategic provision of housing land. I accept this general argument in so far as it is necessary for the local development plan to be consistent with the strategic plan. In this respect, I also recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the 5-year effective housing land supply for the SESplan area of Fife. I further acknowledge the uncertainties expressed under Issue 2(b), Homes, with regard to the level of this shortfall. In turn, it is clear that the loss of allocated land for housing will inevitably exacerbate any shortfall.

71. Clearly it is necessary to assess potential housing sites to ensure that development would not only contribute to the strategic requirement but would also be justified in local land use terms. In this respect, a wide range of concerns has been expressed objecting to the allocation of site KST 001.

72. Certain representations criticise the publicity and consultation undertaken by the council in respect of the plan preparation process. However, concerns of this nature have been considered as part of this examination and the process has been found to be
satisfactory. (See Issue 1).

73. It has been claimed that the site constitutes prime agricultural land and therefore development should be precluded. However, whilst the land is in active agricultural use, the council has confirmed that it is not of prime quality. In turn the general embargo on development of land of prime quality contained in Scottish Planning Policy does not apply. Indeed, in terms of location, the site is adjacent to an existing development and therefore complies with this aspect of the policy principles set out in Scottish Planning Policy.

74. I recognise the concerns expressed in respect of those who believed the land “would never be built on” but the plan preparation process provides an opportunity to review land use allocations. Such a review can then lead to the allocation of previously undeveloped land to meet identified needs, for example, as in this case, for housing. Although the review has taken place relatively soon after the adoption of the current local plan, SESplan, the strategic planning document, has been approved in the meantime. Despite some suggestions to the contrary, the land is not designated “green belt” although even green belt boundaries are themselves open to review.

75. Loss of views as a consequence of building is a further concern but the protection of “private” views is not a function of the planning process. I acknowledge the high quality of the long distance views southwards from Kingseat but the loss of these views from any particular point will not have an impact on the landscape setting of the village. Careful layout and design may ensure that elements of the locally valued views could be retained in the proximity of site KST 001.

76. It has been claimed that the development of the site could not be regarded as “rounding-off” the village. I agree and accept the site represents an extension of the boundary. However, the new development would be bounded on two sides by existing housing. Whilst not “rounding-off”, I believe that the site represents reasonable and natural village growth. As explained, the site accords with the Scottish Planning Policy principle of development adjacent to existing built-up areas.

77. There are significant areas of modern development in the southern part of Kingseat and I consider that careful design could ensure that the existing and proposed development could relate well to each other. Whilst development would bring about an element of change, I do not believe that the scale, nature or location of site KST 001 is likely to destroy the character of the village, as has been claimed in some representations.

78. Attention has been drawn to potential development constraints such as the nearby high pressure gas pipeline and the stability of the site, especially because of old mining activities. These are clearly matters to be taken into account but I note that Taylor Wimpey, the potential developer, has undertaken detailed technical assessments of the site. It appears that the appropriate safety standards could be achieved and that technical considerations do not point to the inability to undertake development. These matters require to be assessed in detail at the time a specific proposal is brought forward but there is nothing at this stage to justify the deletion of the site allocation.

79. Despite concerns that infrastructure and supporting services (including schools, water supply, community facilities, health care and local shopping provision) would be inadequate, the council contends that the plan preparation process has involved
continuing liaison with service providers. I can appreciate local concern but, nevertheless, the council has taken account of infrastructure and I have no clear evidence that adequate provision would not be available. I note also that Policy 3, Infrastructure and Services, requires new development to be accompanied by the infrastructure necessary to allow communities to function sustainably. Policy 4, Planning Obligations, requires developer contributions where development would have an adverse impact on strategic infrastructure capacity or an adverse community impact.

80. It has been suggested that development in the vicinity of Loch Fitty, in particular the resumption of coal extraction, could have adverse impacts on drainage and residential amenity. Any such potential impacts would be the subject of development management by the council but, in any event, these claims have not been substantiated. Further concerns have been raised in respect of the feared impact of the development on the wider traffic network, particularly linked with the potential for the proposed expansion of Dunfermline and the construction of the northern link road. The council and Transport Scotland commissioned an assessment of the traffic impacts on the trunk road network anticipated as a result of the development proposals, including site KST 001, contained in the local development plan. The assessment concludes that the impact would be relatively minor.

81. As explained, details of the development require to be brought forward in due course and assessed through the council's development management procedure. This will include the layout although it appears there is adequate scope for providing a development with "multiple points" of access in accordance with the guidance contained in Scottish Planning Policy. Account must be taken of the frontage to the B912 and I note that the provision of a pedestrian crossing is required. This appears to be a reasonable requirement and, having also noted the comments of Taylor Wimpey, I do not share the concerns that the B912 should preclude the development of the site. Detailed proposals will also include building heights. I have no reason to believe that unacceptable overshadowing of existing buildings would occur but, as explained, the council is in a position to control this aspect of the development.

82. Taylor Wimpey has indicated the possibility of accommodating more than 50 units on the site. As in the case of all housing sites in the proposed plan, this is an estimated capacity and therefore an element of flexibility must always be anticipated. Taking into account the size of the site, the green network requirements and the flexibility potential, I accept the council's argument that an estimated capacity of 50 is appropriate.

83. The Scottish Environment Protection Agency has suggested the need for a flood risk assessment to be specified. As explained elsewhere, Scottish Planning Policy says that the planning system should prevent development which would have a significant probability of being affected by flooding or which would increase the probability of flooding elsewhere. Reduction of functional floodplains should be avoided. Development on the proposed housing site must conform to these requirements. To ensure this, I agree with the Agency that a flood risk assessment should be undertaken. Thereafter, design of development for the site should take into account the findings of the flood risk assessment.

Site at Cuddyhouse Road

84. As explained by the council, strategic housing matters are considered in this examination under Issue 2(b), Homes. I recognise that the council's 2015 Housing Land
Audit identifies a shortfall in the 5-year effective housing land supply for the SESplan area of Fife. However, I also acknowledge the uncertainties expressed under Issue 2(b) with regard to the level of this shortfall. In any case, irrespective of the level of the shortfall in the five-year effective housing land supply, I find that this site would nevertheless be unacceptable as a housing land allocation because the adverse impacts identified below would outweigh the benefits of addressing any shortfall.

85. Although the council has referred to the concern of the Scottish Environment Protection Agency in respect of the proximity of pig farms, it has been indicated subsequently that pig farming activity no longer appears to be undertaken in the vicinity. Certainly, at the time of my site inspection, there was no obvious indication of any local pig farm operations. Indeed, it has been suggested that pig farming has not taken place here for many years.

86. Despite the changing circumstances, the council has confirmed that the residential development of the site would not be acceptable in terms of impact on the landscape setting of Kingseat.

87. I note that the site lies between the northeast boundary of Kingseat and a group of buildings to the east. However, the eastern boundary of the village is clearly defined and contained by a swathe of open land that provides an important contribution to the landscape setting of Kingseat. That swathe would be disrupted by the development of the site, and the visual impact would be exacerbated as the proposed housing would be at the highest elevation locally. I therefore agree that the development of the site would be detrimental to the landscape setting of Kingseat.

88. It has been argued that the site is “effective” but, in the light of my conclusion regarding the landscape setting, I do not agree that housing would be an appropriate land use and therefore the site fails the test of effectiveness in this respect. In turn, I conclude that the required allocation for residential development is not justified and no change should be made to the proposed plan.

LOCHGELLY

LGY 004 West Cartmore

89. The council does not dispute the claim that there has been no interest in this site by developers. Indeed, there seems to be recognition that there are concerns about marketability insofar as the site is allocated as a “housing opportunity” and phased for development beyond 2020. Despite the apparent current lack of interest, I consider that the allocation should remain to provide for the prospect of development in the future especially in view of the improvement of market conditions predicted by participants in the housing hearing session (see Issue 2b, Homes).

LGY 007 Lochgelly Strategic Development Area

90. In total, the Lochgelly Strategic Development Area represents a major project involving the construction of an estimated 2,550 houses along with a significant area of employment land and a range of other community facilities. It is inevitable that the development will have an impact on residents, landowners and others within and around Lochgelly. There will be undoubted changes to the quality of life and amenity experienced by some but, again, this is an expected and inevitable outcome of
development of the scale proposed. There are policy provisions in the proposed plan to ensure that impacts on individuals and property are considered in a fair and appropriate manner. These provisions will be applied through the development management process.

91. Those who have expressed concern about the adequate provision of such matters as water supplies, drainage, local road network, school places and health facilities have raised valid planning considerations. However, the council has recognised and is aware of the need for supporting infrastructure and services. Continuing liaison with service providers and other relevant organisations has taken place and I note that no constraints have been identified that would threaten the implementation of the project. NHS Fife has drawn attention to the possible impact on healthcare services and, in this respect, I believe ongoing discussions would no doubt be beneficial. Such discussions can take place irrespective of whether they are mentioned in the plan but it would be helpful to include a reference to healthcare under the text dealing with detailed requirements.

92. Reference has been made to ground stability and the possibility of viable shallow coal deposits. It is incumbent on developers to ensure that ground conditions are suitable for the type of development proposed and, where appropriate, provide the required mitigation. The council explains that Policy 15, Minerals, deals with possible minerals sterilisation but, nevertheless, I consider a reference in the text would be appropriate.

93. Various extraneous influences have also been raised including the Mossmorran complex, wind turbines, pipeline corridors and the proximity of the A92. These issues have also been included in the council’s planning process and the relevant regulatory authorities have been consulted. I have no reason to believe that development is being proposed in locations that are the subject of any over-riding safeguarding restrictions.

94. An amenity buffer is indicated along the southern boundary of the Lochgelly South section of the proposal and the need to illustrate this requirement has been questioned. However, the importance of such a buffer has not been questioned and I believe that the feature is a fundamental element within the overall design concept. Accordingly, although it has been suggested that appropriate boundary measures could be brought forward at a later date, I agree with the council that it is necessary to establish and clearly illustrate the principle at this time.

95. The potential for impacts on Lumphinnans Farm is raised in terms of access, operational efficiency, and the amenity and stability of buildings including farm cottages. These are important considerations but I accept the council’s argument that matters such as these should be addressed as development proposals progress.

96. Overall, other than for the two additions referred to above, site LGY 007 should remain as set out in the proposed plan.

LGY 012 Launcherhead Park

97. Transport Scotland has suggested that the description of the proposal should involve an “appropriate assessment” of transport options in Lochgelly. This appears to be acceptable to the council although a “necessary assessment” is preferred. I agree that options should be considered but believe that, as a gesture to plain English, this should simply be described as an “assessment”. An assessment of the options clearly
gives rise to the possibility of alternatives being considered, one of which would logically be the renovation of the existing station as suggested by Mr Ward.

98. Whilst recognising the council’s explanation that a relocated station is preferred, I believe the possibility of renovation should not be precluded at this stage. The text should therefore be amended to make an appropriate reference. The insertion suggested by Transport Scotland should also be included although, again, reference should be made only to “an assessment”.

99. The proposed plan should be amended accordingly.

COUNTRYSIDE AREA

Site LWD 009 Westfield Green Business Park

100. The council agrees with the principle of extending the operational area of the site to permit employment and energy generation uses while, at the same time, contributing to wider restoration. I believe this to be a worthwhile objective and therefore endorse the council’s suggested change to the proposed plan to reflect the representation by Hargreaves.

Site LWD 020 Mossmorran

101. Shell UK Ltd has suggested an additional development requirement with which the council agrees. I recognise the over-riding need for safety and conclude that the proposed plan should be amended and specify the need for development within pipeline consultation zones to accord with the advice of the Health and Safety Executive.

Candidate site LDP-LWD006 St Ninian’s and Loch Fitty Surface Mine

102. The Mid Fife Local Plan indicates that the St Ninian’s opencast site, adjacent to Kelty, is to be restored to a form that could accommodate a variety of leisure and tourism developments within its boundary. Support is given to a “massive Land Art project” which would be central to the restoration of the site.

103. In the proposed plan, Figure S3, Spatial Strategy, identifies the “St Ninian’s restoration” and the spatial strategy for rural areas states “the Plan’s policies are intended to help diversify the economy and allow investment in the infrastructure tourism needs.” Green network opportunities are shown at Loch Fitty and in the northeastern part of the area of candidate site LDP-LWD006. Much of the site is shown as “shallow coal deposits” with a symbol for an operational surface coal mine. Part of the southern part of the site is identified as “superficial sand and gravel”.

104. Hargreaves has intimated an intention to take forward a previously identified range of tourism and leisure uses as post-mining activities and, on this basis, requires designation of the area for a mixed-use development. I note the council supports the principle of development for tourism and leisure. To this end, the council has suggested that a further development allocation, LWD 032, St Ninians, should be included in the proposed plan. The allocation would reflect the content of the current local plan, and I therefore share the council’s opinion that an addition should be made to the proposed plan. Note: the reference should be LWD 033 to take account of proposed new allocation LWD 032 at Castlehill Mine, west of Blairhall. (See Issue 5, Southwest
105. Hargreaves has referred to a number of specific uses. However, I agree with the council that a more general allocation is appropriate requiring the preparation of a master plan to guide future developments. Similarly, the allocation should be shown on the proposals map in the form of a symbol. This approach would allow full assessment of individual elements of the wider project. Such careful consideration is important in this countryside location.

106. In my consideration of site KST 001, Kingseat Road, I noted the concerns expressed about the future of Loch Fitty and local drainage should surface mining resume. Loss of a local recreational facility is also feared but the inclusion of allocation LWD 033 could provide the basis for a range of leisure activities which would benefit the local community.

107. All-in-all, I conclude the proposed plan should be modified as proposed by the council.

Candidate site LDP-CLU001 Cluny Farm

108. The site extends to some 3.36 hectares to the west of the small settlement of Cluny. Although the theoretical capacity of the site has been assessed between 35 and 65 houses, depending on market conditions, the access arrangements would limit the potential for development. In this respect, the site assessment states that a single access from the B981 to the south of the site would be possible. This access provision would reduce the capacity to about 20 houses, a total which I consider would not have great strategic significance in the wider housing land supply context.

109. More locally, in terms of Cluny - described in the site assessment as a cluster of houses along the road frontages - I believe the size of the proposal, albeit reduced to accord with the access, would have an impact on the settlement. I acknowledge that there is an adjacent recent development at Woodland Gait which I understand to have involved the redevelopment of an agricultural buildings complex. Nevertheless, especially because of the location of the access, further development at Cluny Farm would not relate well to the village. Although adjacent to the settlement boundary development at this location would appear detached from the village form and would therefore not fulfil the place-making guidance of Scottish Planning Policy.

110. All-in-all, I do not think the the required development would represent the natural or “organic” growth of Cluny and therefore the allocation of the land for housing purposes is not justified.

111. In reaching this conclusion, I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the 5-year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under Issue 2b (Homes) with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that this site would nevertheless be unacceptable because the adverse impacts identified above would outweigh the benefits of addressing any shortfall.

Blairadam Wind Farm

112. This representation is essentially intended to support a currently proposed
development: Blairadam Wind Farm. The site is within the Cleish Hills Local Landscape Area (referred to as the “Cleish Hills Special Landscape Area” in the representation) and the submission argues that the land within which the wind farm is proposed should be removed from this designation. On this basis, it is claimed, the wind farm lies within Group 3 of Table 1, Spatial Frameworks, in Scottish Planning Policy. In turn, it is contended, the proposed plan should acknowledge that wind farm development is acceptable at this site.

113. As the council explains, the proposed plan does not allocate sites for wind farms and areas of search are identified in supplementary guidance. Certainly, I agree that the proposed plan is not a document that could make a case for a particular proposal. Any such assessment must be made on merit in the context of policy.

114. It was argued in support of the wind farm proposal that there was no clear reason for the landscape designation. On the other hand, Scottish Natural Heritage has pointed out that such designations relate to landscapes that are valued locally. Whilst, clearly, local landscape areas must have a reasonable basis, local perception plays a part in designation. In this case I have been provided with no compelling case for the removal of the designation in total or in part. I therefore conclude that the proposed plan should not be altered.

Reporter’s recommendations:

I recommend the following modifications be made:

1. On page 26 of the proposed plan, under reference BGY 001 Flock House South, insert as an additional development requirement following the reference to flood risk assessment:

   “Buffer strips of widths to be determined and agreed shall be provided adjacent to the Lochty Burn along the northern boundary of the site and the watercourse along the southern boundary of the site.”

2. On page 27 of the proposed plan, under LHR 001, Capeldrae Farm, insert the following additional sentence at the end of the first paragraph of “Status, additional development requirements, and other information”:

   “There are potential restrictions arising from the nearby pipeline and therefore an element of flexibility may be applied to the disposition of the housing land and community open space within the site.”

amend the second paragraph of “Status, additional development requirements, and other information” as follows:

   “Access to the site shall be taken from New Flockhouse which offers the opportunity to provide two vehicular access points.”

insert an additional requirement to the “Status, additional development requirements, and other information” as follows:

   “6 metre buffer strips are required between the watercourses to the east of the site
and the built development”.

3. On page 109 of the proposed plan, under KST 001 Kingseat Road, insert an additional development requirement:

“A flood risk assessment must be undertaken prior to the development of this site. Design of development must take account of the findings of the flood risk assessment.”

4. On page 139 of the proposed plan, under site LGY 007, Lochgelly Strategic Development Area in “Detailed requirements include” amend “Community facilities” to “Community facilities including healthcare” and after the section requiring a flood risk assessment, insert the following:

“Attention is drawn to the possibility of shallow coal deposits: the potential for extraction prior to or as part of any development shall be investigated.”

5. On page 141 of the proposed plan, under reference LGY 012, Launcherhead Park: “Description” should be amended to:

“Assessment of transport options in Lochgelly”

The text of the “Status, additional development requirements, and other information -” should be amended to:

“The consideration of options requires an assessment of the viability and deliverability of providing a relocated rail station based on Scottish Transport Appraisal Guidance (STAG) principles. Dependent on the outcome of the assessment, a robust business case will follow. Notwithstanding this, Transport Scotland currently has no plans to fund or deliver a station at this location and an alternative source of funding will require to be identified. Discussion and agreement with Transport Scotland and Network Rail is required.

In the event that the preferred option is to relocate the existing rail station, land at Launcherhead Park will be safeguarded. If playing fields are lost as a consequence of the relocation of the station, they will have to be replaced elsewhere. “

6. On page 50 of the proposed plan, under site LPH 001, Lochgelly Road, amend the second development requirement as follows:

“Road access should be provided in accordance with Fife Council’s transportation standards guidance and a secondary pedestrian link to the south is to be formed if practicable.”

7. On page 50 of the proposed plan, under site LPH 003, Land to the north of Lumphinnans, insert the following additional development requirement between “….. Strategic Development Area.” and “A Transport Assessment is required…”:

“Attention is drawn to the possibility of a shallow coal deposit: the potential for extraction prior to or as part of the development shall be investigated.”
8. On page 183 of the proposed plan, under site LWD 009, Westfield Green Business Park, Status, additional development requirements, and other information, change the third paragraph to:

“Site LWD 009 is an important opportunity site for green business and employment land. It forms part of the wider Westfield site, which has planning permission for the provision of waste resource recovery facilities and comprehensive rehabilitation and restoration of the site. This includes a materials recycling facility, composting facility, residual waste landfill site, engineering operations associated with comprehensive land restoration and stabilisation of water bodies, land for a sustainable business park, engineering operations to upgrade rail and service road facilities and ancillary office and education facilities.”

following which, insert an additional (fourth) paragraph as follows:

“Development proposals extending beyond designated site LWD 009, which relate to employment and energy generation uses and contribute to the restoration of the wider Westfield location, will be supported subject to detailed considerations as set out below.”

9. On page 186 of the proposed plan, under site LWD 020, Mossmorran potential expansion, insert a further additional development requirement as follows:

“Proposals within areas of the site that are covered by Health and Safety Executive pipeline consultation zones must take account of the HSE Planning Advice for Development near Hazardous Installations (PADHI) guidance. The scale and type of development (in particular, any residential development) within these zones will be restricted.”

10. On page 188 of the proposed plan, insert the following additional allocation under,

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<td>-</td>
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<tr>
<td>Description:</td>
<td>Leisure, tourism and recreation uses</td>
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<td>Est. capacity (Housing):</td>
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<td>Lead Agency:</td>
<td>Private sector</td>
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“Status, additional development requirements, and other information -

This site is suitable for mixed Leisure/Tourism/Recreation based uses, complementing the restoration work carried out at St Ninian’s and taking advantage of the proximity of the M90 Junction 4, the national footpath/cycleway network and other large scale recreational facilities in the area (including Lochore Meadows, Knockhill and Blairadam Forest).

The developer should prepare a master plan for the future development of the area for Fife Council approval.

A flood risk assessment requires to be undertaken prior to development on this site.
Green Network Priorities:

There is considerable potential to develop tourism in the wider area. Ensure good quality connections are established between Kelty and the St. Ninian’s Land Art Project – a key tourist attraction in the future. Also consider carefully the treatment of junction 4 of the M90 as a key gateway to the wider Ore Valley and the St. Ninian’s Land Art Project: a landscape-led approach to the junction might be most appropriate.”

11. On the Proposals Map insert a symbol (a black, cross-hatched circle including “LWD 032”) in the proximity of St Ninian’s Open Cast Mine as indicated on the map provided by the council in response to Further Information Request 66.
## Issue 12

### Glenrothes Area

**Development plan reference:**

Settlement Plans: Coaltown of Balgonie (page 96), Glenrothes (pages 87 – 93), Kinglassie (page 107), Leslie (page 94), Markinch (page 95), Milton of Balgonie (page 144) & Star of Markinch (page 173)

**Reporter:** Richard Dent

### Body or person(s) submitting a representation raising the issue (including reference number):

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<tr>
<td>P F B Paterson (19)</td>
<td>Moira Thomson (3528)</td>
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<td>Pat Atkin (260)</td>
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<td>Isa Vance (738, 739, 740)</td>
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<td>Susan Ramsay (71)</td>
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Raith Developments Limited (1284)
Persimmon Homes (East Scotland) (1975)

GLE 003 Viewfield, GLE 026 Westwood Park & GLE 028 Stenton
SEPA (3405, 3455 & 3457)

GLE 004 Land to the south of Cadham Road
Tullis Russell (1077)
Liam Mason (1389)
Cadham Resident (2188)
Morris Brown (2227)
Michael Adamson (2255)
Vicky Crooks (2269)
SEPA (3407)
Marguerite Ferguson (3665)
North Glenrothes Community Council (3704)

GLE 005 Whitehill Industrial Estate
Robert Hutchison (153)

GLE 006 Crompton Road East, GLE 008 Crompton Road West, GLE 009 Dalton Road 1, GLE 019 Land south of Fife Airport, GLE 020 Southfield South East, GLE 021 Spectrogon, Southfield Industrial Estate & GLE 023 Whitworth Road
SEPA (3408, 3409, 3410, 3413, 3451, 3452, 3454)

LES 002 Prinlaws Mill and LES 003 South of Walkerton Drive
CWP (Tor Property Developments Ltd) (725 & 726)
Kingdom Housing Association (1184 & 1186)
SEPA (3546 & 3548)

MARKINCH
Lomond Homes (846)
Lorna Ross (1139)
Taylor Wimpey (1211)

GLE 031 Albany Gate, GLE 032 Marchmont Gate, GLE 033 South Street Car Parks & GLE 034 North Street redevelopment
Glenrothes Area Futures Group (1320, 1321, 1322 & 1323)

GLE 036 A92 Route Strategy improvements
Liam Mason (2111)
Transport Scotland (3220)

KINGLASSIE
Kinglassie Community Council (2716)

KLS 001 Laurence Park South
Jane Clements (1525)
SEPA (3535)

LES 001 Leslie House
CWP (Tor Property Developments Ltd) (692)
Kingdom Housing Association (1194)

LES 001 Leslie House
SEPA (3257)
Balgonie Estates Limited (2077)
Milton and Coaltown of Balgonie Community Council (2834)
SEPA (3579)

STAR OF MARKINCH
Kingdom Housing Association (1197)
Deborah Klein (1658)
Peter Fleming (1795)
Lorraine Fleming (2235)
Ross Carlin (2409)

SOM 001 West End Dairy
Peter Fleming (83)
Angela Clark (85)
McLaughlin (130)
Doreen Whittaker (136)
Lorraine Fleming (138, 212)
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**Provision of the development plan to which the issue relates:**

Settlement Plans: Coaltown of Balgonie, Glenrothes, Kinglassie, Leslie, Markinch, Milton of Balgonie & Star of Markinch

**Planning authority’s summary of the representation(s):**

**COALTOWN OF BALGONIE**

Coaltown of Balgonie Issues

P F B Paterson (19): Should any further development take place, the domestic water infrastructure serving the village will, in my view, require significant upgrading.

**CLB 001 Coaltown of Balgonie east**

Balgonie Estates Limited (2073): Balgonie Estates Limited supports the continued allocation of site CLB001

Milton & Coaltown of Balgonie Community Council (2831): Design of this site will have to respect the views of the surrounding properties. Access into the site will have to be carefully designed to take the increase in traffic anticipated. The water supply for the village will have to be upgraded.
CLB 002 Land to the north of Pytree Road

Balgonie Estates Limited (2075): Balgonie Estates Limited supports the continued allocation of site CLB002

Milton & Coaltown of Balgonie Community Council (2832): Design of this site will have to respect the holly tree and surrounding properties. Access into the site will have to be carefully designed to take the increase in traffic anticipated. The water supply for the village will have to be upgraded.

CLB 003 North of Main Street

Milton & Coaltown of Balgonie Community Council (2833): Unsure of how this site will be accessed. Development of this site could create substantial traffic problems onto Main street. The water supply for the village will have to be upgraded. Land should be safeguarded within this site for school expansion

SEPA (3327): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken.

Sites (not in the Proposed FIFEplan) proposed by Objectors

Candidate Site LDP-COB002

Persimmon Homes (1661): Object to non-inclusion of site at land to the north of Main Street for housing development. Supporting information provided to address concerns raised by Fife Council in regards to this site and to show effectiveness of this site.

GLENROTHES

Glenrothes issues

TMS Planning Ltd (572): Object to a site at Nether Stenton Farm being zoned for employment as the site is residential in use.

Brian Sheerins (2334): Interested to know when the 'Designing Places' guidance will be published in the context of the 'promoted' site at Milldeans Farm.

NHS Fife (3846): Additional 192 houses under construction and potential additional 2145 houses in this area could have impact on local healthcare services. It would be of benefit for discussions with NHS Fife to be arranged to confirm status of local GP and other healthcare services.

GLE 001 Balgeddie Riding School

Persimmon Homes (1973): Number of units remaining on site is not identified. Without this information it is impossible to determine what impact this has on the LDP Housing Supply, and whether the supply is correct.

The Woodland Trust Scotland (2893: Buffer strip should be proposed between development site and adjacent ancient woodland.
GLE 002 Lochtybridge

Raith Developments Limited (1284): Support continued allocation of site GLE 002 but object to open space designation to the south of this site on grounds that this open space zoning is not consistent with others in the local area. An amended open space boundary is proposed which addresses the issue of coalescence. This could help deliver extra housing on this site in the short term.

Persimmon Homes (1975): Number of units remaining on site is not identified. Without this information it is impossible to determine what impact this has on the LDP Housing Supply, and whether the supply is correct.

GLE 003 Viewfield, GLE 026 Westwood Park & GLE 028 Stenton

SEPA (3405, 3455 & 3457): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken.

GLE 004 Land to the south of Cadham Road

Liam Mason (1389), Morris Brown (2227), Michael Adamson (2255), Owner Occupier (2188), Vicky Crooks (2269), Marguerite Ferguson (3665), North Glenrothes Community Council (3704): Object to allocation of this site on grounds of access, detrimental effect to the conservation area, impact on infrastructure (dental surgery, GP surgery, schools), access and development of green spaces, environmental issues, loss of wildlife habitat as this site is home to a variety of different species, flooding and ground conditions, Site should be re-designated as agricultural land.

If site is to be developed there should be a buffer between the conservation area and this site and access to site should be from the Tullis Russell roundabout. Cadham Road is not suitable for an increase in traffic. Support green network proposal to south of the site as this could complete the existing cycle network within Glenrothes joining Riverside park with the route between Tullis Russell and Markinch railway station (as well as national cycle route 766).

In the event of Tullis Russell closing this site should be looked at for redevelopment.

SEPA (3407): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken and also support the inclusion of the requirement to consider through a feasibility study, the potential for restoration and improvement of the water environment through the site design.

Tullis Russell (1077): Object to the proposed access being taken from A92 Markinch Roundabout. There is no basis or justification for the access to be taken from the A92, and indeed this introduces potential infrastructure issues where none exist at present.

GLE 005 Whitehill Industrial Estate

Robert Hutchison (153): Support proposals for this site.
GLE 006 Crompton Road East, GLE 008 Crompton Road West, GLE 009 Dalton Road 1, GLE 019 Land south of Fife Airport, GLE 020 Southfield South East, GLE 021 Spectrogon, Southfield Industrial Estate & GLE 023 Whitworth Road

SEPA (3408, 3409, 3410, 3413, 3451, 3452 & 3454): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken and for a buffer strip along the watercourse.

GLE 010 Dalton Road 2

SEPA (3412): Support the inclusion within the Development Requirements for a buffer strip along the watercourse.

GLE 029 North Street/Falkland Gate

Glenrothes Areas Futures Group (1318): Support proposal GLE029 and urge that this proposal is implemented as soon as possible.

GLE 030 Queensgate

Tullis Russell (1219): Request that the range of permitted uses for this brownfield urban site should include residential and other commercial uses such as food/drink.

GLE 031 Albany Gate, GLE 032 Marchmont Gate, GLE 033 South Street Car Parks & GLE 034 North Street redevelopment

Glenrothes Areas Futures Group (1320, 1321, 1322 & 1323): Wish to see concrete signs that the improvements suggested here will take place as Glenrothes Town Centre is outdated in its design and does not form an attractive centre externally which is currently to the detriment of the whole community.

GLE 036 A92 Route Strategy improvements

Transport Scotland (3220): Transport Scotland currently has no plans to fund or deliver potential upgrades to the A92 trunk road. Alternative wording is provided for this proposal.

Liam Mason (2111): Support the proposed strategic transport intervention on the North Glenrothes routes.

Sites (not in the Proposed FIFEplan) proposed by Objectors

Candidate Site LDP-GLE002 – Milldeans

Mr and Mrs Alistair Cochrane (704), Hallam Land Management (2987): Object to non-inclusion of this site. Supporting information (see representation 704 & 2987) is provided to show the following:

- How the Council is not meeting the housing land requirement within the FIFEplan period;
- How the Council is not meeting the 5 year housing land supply requirement throughout the FIFEplan period.
The allocation of this site will contribute to:

- Meeting the Council’s housing land requirement within the FIFEplan period;
- Meeting the Council’s 5 year housing land supply requirement throughout the FIFEplan period;
- Responding to the immediate housing need to provide affordable, family housing in a range of locations and sites within the Strategic Development Areas;
- Preserving and enhancing the Council’s Green Network strategy;
- Providing a long term, sustainable and defensible settlement boundary to the west of Glenrothes;
- Regeneration by encouraging new and existing residents to utilize local shops and services avoiding the intensification of dormitory commuter characteristics; it will help sustain the viability and vitality of local services and Glenrothes town centre; and
- The Council’s infrastructure needs, through potential financial contributions which are fairly and reasonably related to the proposed site.

Susan Ramsay (71), Janet Reid (128), John Ramsay (112), Sharon Middleton (113), Sharon Middleton (114), David Reid (117), Robert Hutchison (152), Pat Atkin (260), Nicola Wallace (255), Edith Sheerins (264), Brian Sheerins (554), Frank McCann (838 & 839), John Vance (741 & 742), Isa Vance (738, 739 & 740), Rosalind Fielder (802), Fiona Beveridge (743), Alf and Doreen Downie (683), William Ramsay (697), Cheryl McCann (841), Joe McCann (843), Ryan McCann (844), Brian Sheerins (2167 & 2183), Joanna McDaid (1428), Liam Fraser (1660), Katy Fraser (1659), John Wallace (1611, 2012 & 2009) and 330 signature petition: Support non-inclusion of this site on the following grounds:

- Access issues on Rosemount Road
- road safety
- Traffic generation
- not near main transport routes which are to the east of Glenrothes
- access for emergency vehicles
- Impact on infrastructure – schools, dentist, doctors, drainage, sewerage
- Sustainability
- Ground capability (mine workings in the area), contamination.
- Impact on wildlife, nature conservation privacy, heritage/history
- development on greenfield land, development outwith settlement boundary
- Site out of scale with the area, potential coalescence with Leslie
- Spoil the character of the area
- Impact on security, overlooking, loss of light/overshadowing, noise and disturbance,
- stress on local amenities
- flooding,
- contrary to structure plan.

KINGLASSIE

Kinglassie Issues

Kinglassie Community Council (2716): Reservations about housing allocations in Kinglassie on grounds of flooding and that further large scale development will spoil the character of this small friendly village.
KLS 001 Laurence Park South

Jane Clement (1525): Reservations about housing allocations in Kinglassie on grounds of flooding, infrastructure (lack of shops, school at capacity) and road issues particularly around the Cluny junction.

SEPA (3535): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken and for a buffer strip along the watercourse.

LESLEY

LES 001 Leslie House

SEPA (3257): Request an expansion of the developer requirements to specify the need for a flood risk assessment and ensure that no built development takes place on the functional flood plain (or within an area of known flood risk) will help promote a sustainable approach to managing flood risk.

LES 002 Prinlaws Mill and LES 003 South of Walkerton Drive

CWP (725 & 726): Object to allocation of these sites as housing sites on grounds of topography, flooding, access and nature conservation and the site not being effective.

Kingdom Housing Association (1184 & 1186): Object to these proposals and seek their removal as housing proposals; and re-designating the sites as a brownfield opportunities with no reliance on either to contribute to the housing supply within the Plan period. Supporting information provided showing that sites LES002 and LES003 are non-effective for a number of reasons including access, ownership, topography and flooding and should not count towards the housing land supply (see representations 1184 & 1186).

SEPA (3546 & 3548): Support the inclusion within the Development Requirements for Flood Risk Assessments (FRAs) to be undertaken and for a buffer strip along the watercourse and also support the inclusion of the requirement to consider through a feasibility study, the potential for restoration and improvement of the water environment through the sites’ design and support the inclusion of Site Requirements for high quality SUDS.

Sites (not in the Proposed FIFEplan) proposed by objectors

Candidate site LDP-LES001

Kingdom Housing Association (1194): Kingdom Housing Association objects to the exclusion of former Candidate Site LES 001 – Lomond View, Leslie - from a residential allocation in Fifeplan, and to the inclusion of Proposed FIFEplan Sites LES002 [Prinlaws Mill] and LES003 [South of Walkerton Drive] within it. The Association requests that the following two modifications be made to Fifeplan –

A. The southern portion of the Lomond View site [as per Figure 14, page 37 of the attached Landscape & Visual Impact Assessment by Brindley Associates] be allocated to deliver 36 houses, with the northern portion redesignated as Open Space.
B. The Prinlaws Mill and The South of Walkerton Drive sites be re-designated as ‘brownfield opportunities’, with no reliance on either to contribute to the housing supply within the Plan period.

Supporting information is provided showing that this site is effective and being promoted by a housebuilder and that any access, physical and landscape issues can be overcome and this site will help provide well needed affordable housing in the area.

Candidate site LDP-LES003

CWP (692): Object to non-allocation of candidate site LDP-LES003, and supporting information is provided showing that this site is effective and being promoted by a housebuilder and that any physical and landscape issues can be overcome (see representation 692). Development here would not affect the Lomond Hills SLA. This site could help meet the housing land shortfall. Concerns over the effectiveness of FIFEplan proposal sites LES002 and LES003. Object to strategy for the Ore/Upper Leven Valley which focuses on large scale releases, this should be amended to allow organic growth in smaller settlements such as Leslie.

MARKINCH

Markinch Issues

Markinch Community Council (1478): Any new development in Markinch will have an impact on the local infrastructure especially with regards to capacity at the school and doctors surgery and traffic problems on the main street and surrounding areas.

MAR 001 Markinch South

Miller/King Ltd (662): Support the continued allocation of site MAR 001 however would like to see the boundary for the site amended to take out an area of land that is undevelopable and also remove the requirement for 2ha of employment land. Believe that there is an oversupply of employment land within this area and also there is no demand for employment land in Markinch. Inclusion of employment land will have serious implications over the deliverability of this site.

Markinch Community Council 1481): Concerns over the number of units proposed on this site and the impact on infrastructure and local biodiversity and potential flood risk.

Some residents of Markinch also supportive of development here to help regenerate the area.

The Woodland Trust Scotland (2916): Sufficient buffering between the proposed development and woodland should be identified in planning policy at the appropriate stage.

SEPA (3572): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken and for a buffer strip along the watercourse and also support the inclusion of the requirement to consider through a feasibility study, the potential for restoration and improvement of the water environment through the site design.
MAR 002 Sweetbank Park Terrace

Markinch Community Council (1484): Concerns over the number of units proposed on this site and the impact on local biodiversity, potential flood risk and access to the site. SEPA (3573): Support the inclusion within the Development Requirements for a buffer strip along the watercourse and also support the inclusion of the requirement to consider through a feasibility study, the potential for restoration and improvement of the water environment through the site design.

Sites (not in the Proposed FIFE plan) proposed by Objectors

Candidate Site LDP-MAR001

Taylor Wimpey (1211): Object to non-allocation of site at Barnslee. Supporting information provided to show the effectiveness of this site and how it could be integrated into the settlement (see representation 1211). Allocation of this sustainable site can help meet the housing land requirement as there is currently a shortfall.

Markinch Community Council (1478): Object to the proposed site at Barnslee due to the size of development proposed and issues concerning flood, biodiversity and physical heritage remain.

Site at The Glebe, Brunton Road

Lomond Homes (846): Object to the de-allocation of a site at Brunton Road. The site is effective as it benefits from an extant Planning Permission in Principle and An Approval of Matters Specified in Conditions application has been registered. The principle of housing on this site has been set by its allocation in previous adopted plans and inclusion in Housing Land Audits.

Lorna Ross (1139), Markinch Community Council (1478): Support the de-allocation of the Glebe site. The site is unsuitable for development due to underlying peat which plays an important environmental role in the area. If Peat is removed this could increase flood risk. Roads are not suitable for increase in traffic.

Sutherland (1398), Professor Robert Lethbridge (1522): Support de-allocation of the Glebe site. The site has not been developed despite numerous planning applications. Building should not take place on a peat based flood plain.

Chris Wands (3118), James Wands (3112): Support de-allocation of this site. The site has not been developed despite numerous planning applications and is not an effective housing site. The Glebe is unsustainable in any local plan. The local infrastructure, including the nursery and primary school, and GP Medical Service, is at bursting point.

Land west of Croft Crescent

Luke Mosson (1704): Promote alternative small scale site that could help contribute to the housing land requirement. Site sits adjacent to existing settlement boundary and is easily accessible.
MILTON OF BALGONIE

MOB 001 Balfour Place/Main Street

Henry Maxwell (41): Object to allocation of this site on grounds of increased flood risk and road safety due to the proximity to Milton Primary School.

Robert Farmer (382): Object to allocation of this site. Development here would increase the size of the village by 30%. Local infrastructure won’t cope. Local Schools are at capacity and development would increase flood risk and traffic congestion on Main Street.

Balgonie Estates Limited (2077): Support allocation of this site and request that the capacity of this site is increased. Unit numbers should be informed by a masterplan approach to delivery of the site.

Milton & Coaltown of Balgonie Community Council (2834): This site would require sensitive designing to ensure that the rural nature of the village is retained.

SEPA (3579): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken

STAR OF MARKINCH

SOM 001 West End Dairy

Mr & Mrs McLaughlin (130), Peter Fleming (83), Angela Clark (85), Lorraine Fleming (212 & 138), Doreen Whittaker (136), Thomas Wright (377), Hannah Wright (464), Alan Mitchell (506), James Aitken (657), Billy Allen (1302), Gwen Allen (1232), Don Gibson (1452), Deborah Klein (1343), Douglas Stewart (1383), Lyndsey Schaller (1520), Anne Schaller (1535), Marion Gray (1668 & 1697), Alison Gibson (1871 & 2048), Peter & Anne Wood (1772 & 1781), Angela Thomson (1798), Catharine Jones (2179), Michael Ironside (2229), Thomas Whitton (2248), Mark Thomson (2324), Jennifer Adamson (2322), Ross Carlin (2408), James Thomson (3357), Moira Thomson (3528): Object to inclusion of this site on the following grounds:

- Road safety - the roads aren’t suitable for increased traffic.
- There is no demand for housing here, plenty of housing been built in the last 10 years and still haven’t been sold.
- Development here will affect the character of the village and health of its inhabitants.
- Severe impact on infrastructure of the village (Sewerage, power, drainage, schools).
- There is a lack of amenities in the village.
- Water pressure problems.
- There should be no development on greenfield site outwith the settlement envelope.
- This site is close to Star Moss SSSI and could have a detrimental effect on this.
- Object to inclusion of this site after it was rejected in the Adopted Mid Fife Local Plan.
- Proposed development is out of character with the existing linear development in Star
J Rutherford (2056): Support inclusion of this site. Supporting information provided to show the effectiveness of this site and how this site can be delivered (see representation 2056).

Kingdom Housing Association (1188): Object to inclusion of site SOM001 and request that this site is replaced by their site at Plunkie Farm.

Sites (not in the Proposed FIFEplan) proposed by Objectors

Kingdom Housing Association (1197): Object to inclusion of site SOM001 and request that this site is replaced by their site at Plunkie Farm (see representation 1197). The site at Plunkie Farm will deliver a significant number of affordable houses; will enhance access and parking in the village associated with the local football club; open up access to a derelict steading for redevelopment; and presents no adverse infrastructural, environmental, or landscape issues – as well as being in the ownership of a housebuilder.

Peter Fleming (1795), Deborah Klein (1658), Lorraine Fleming (2235), Ross Carlin (2409): Support non-inclusion of site at Plunkie Farm. No demand for housing here, plenty of housing been built in the last 10 years and still haven’t been sold. Development will affect the character of the village and health of its inhabitants. Severe impact on infrastructure of the village (sewerage, power, drainage, schools). There is a lack of amenities in the village. There should be no development on greenfield site outwith the settlement envelope. Object to inclusion of this site after it was rejected in the Adopted Mid Fife Local Plan. Proposed development is out of character with the existing linear development in Star.

Modifications sought by those submitting representations:

COALTOWN OF BALGONIE

Coaltown of Balgonie Issues

P F B Paterson (19): none stated.

CLB 001 Coaltown of Balgonie east

Balgonie Estates Limited (2073), Milton & Coaltown of Balgonie Community Council (2831): none stated.

CLB 002 Land to the north of Pytree Road

Balgonie Estates Limited (2075), Milton & Coaltown of Balgonie Community Council (2832): none stated.

CLB 003 North of Main Street

Milton & Coaltown of Balgonie Community Council (2833), SEPA (3327): none stated.
Sites (not in the Proposed FIFEplan) proposed by Objectors

Candidate Site LDP-COB002

Persimmon Homes (1661): Allocate site at land to the north of Main Street for housing development in FIFEplan.

GLENROTHES

Glenrothes issues

TMS Planning Ltd (572): Request that employment designation is removed from site at Nether Stenton Farm.

Brian Sheerins (2334): The 'Designing Places' guidance was published for consultation in April 2015.

GLE 001 Balgeddie Riding School

Persimmon Homes (1973): Identify the number of units remaining on site.

The Woodland Trust Scotland (2893): Request that the provision of a Buffer strip be proposed between development site and adjacent ancient woodland in the Development Requirements for this site.

GLE 002 Lochtybridge

Raith Developments Limited (1284): Request removal of open space designation to the south of the site.

Persimmon Homes (1975): Identify the number of units remaining on site.

GLE 003 Viewfield, GLE 026 Westwood Park & GLE 028 Stenton

SEPA (3405, 3455 & 3457): none stated.

GLE 004 Land to the south of Cadham Road

Liam Mason (1389), Morris Brown (2227), Michael Adamson (2255), Owner Occupier (2188), Vicky Crooks (2269), Marguerite Ferguson (3665), North Glenrothes Community Council (3704): Delete site GLE 004 from FIFEplan.

SEPA (3407): none stated.

Tullis Russell (1077): Delete the requirement for access to come from the Tullis Russell roundabout.

GLE 005 Whitehill Industrial Estate

Robert Hutchison (153): none stated.
SEPA (3408, 3409, 3410, 3413, 3451, 3452 & 3454): none stated.

GLE 010 Dalton Road 2

SEPA (3412): none stated.

GLE 029 North Street/Falkland Gate

Glenrothes Areas Futures Group (1318): none stated.

GLE 030 Queensgate

Tullis Russell (1219): Request that the range of permitted uses for this brownfield urban site should include residential and other commercial uses such as food/drink.

GLE 031 Albany Gate, GLE 032 Marchmont Gate, GLE 033 South Street Car Parks & GLE 034 North Street redevelopment

Glenrothes Areas Futures Group (1320, 1321, 1322 & 1323): none stated.

GLE 036 A92 Route Strategy improvements

Transport Scotland (3220): Recommended that the following wording is included within the ‘Status, additional development requirements, and other information’ row on page 93:

“Transport Scotland currently has no plans to fund or deliver potential improvements to the A92 trunk road. Any potential improvements and/or upgrades will require to be provided at development management stage, as a requirement resulting from proposed development impacts with funding identified by the developer or others. This should be discussed with Transport Scotland at the earliest opportunity.”

Liam Mason (2111): none stated.

Sites (not in the Proposed FIFEplan) proposed by Objectors

Candidate Site LDP-GLE002 – Milldeans

Mr and Mrs Alistair Cochrane (704), Hallam Land Management (2987): Allocate candidate site LDP-GLE002 – Milldeans in the FIFEplan.

Susan Ramsay (71), Janet Reid (128), John Ramsay (112), Sharon Middleton (113, 114), David Reid (117), Robert Hutchison (152), Pat Atkin (260), Nicola Wallace (255), Edith Sheerins (264), Brian Sheerins (554, 2167, 2183), Frank McCann (838 & 839), John Vance (741 & 742), Isa Vance (738, 739 & 740), Rosalind Fielder (802), Fiona Beveridge (743), Alf and Doreen Downie (683), William Ramsay (697), Cheryl McCann (841), Joe McCann (843), Ryan McCann (844), Joanna McDaid (1428), Liam Fraser (1660), Katy Fraser (1659), John Wallace (1611, 2012 & 2009) and 330 signature...
petition: none stated.

**LESLIE**

**LES 001 Leslie House**

SEPA (3257): Request an expansion of the developer requirements to specify the need for a flood risk assessment and ensure that no built development takes place on the functional flood plain (or within an area of known flood risk) will help promote a sustainable approach to managing flood risk.

**LES 002 Prinlaws Mill and LES 003 South of Walkerton Drive**

CWP (725 & 726): Delete site from FIFEplan.

Kingdom Housing Association (1184 & 1186): Site should be re-designated as a brownfield opportunity site.

SEPA (3546 & 3548): none stated.

Sites (not in the Proposed FIFEplan) proposed by objectors

**Candidate site LDP-LES001**

Kingdom Housing Association (1194): The Association requests that the following two modifications be made to Fifeplan:

A. The southern portion of the Lomond View site [as per Figure 14, page 37 of the Landscape & Visual Impact Assessment by Brindley Associates] be allocated to deliver 36 houses, with the northern portion redesignated as Open Space.

B. The Prinlaws Mill and The South of Walkerton Drive sites be re-designated as ‘brownfield opportunities’, with no reliance on either to contribute to the housing supply within the Plan period.

**Candidate site LDP-LES003**

CWP (692): Allocate candidate site LDP-LES003 as a housing proposal in FIFEplan.

**KINGLASSIE**

**Kinglassie Issues**

Kinglassie Community Council (2716): No specific amendment to FIFEplan stated.

**KLS 001 Laurence Park South**

Jane Clement (1525): No specific amendment to FIFEplan stated.

SEPA (3535): none stated.
### MARKINCH

#### Markinch Issues

Markinch Community Council (1478): No specific amendment to FIFEplan stated.

**MAR 001 Markinch South**

Miller/King Ltd (662): Amend FIFEplan to take out an area of land that is undevelopable and also remove the requirement for 2ha of employment land.

Markinch Community Council 1481): No specific amendment to FIFEplan stated.

The Woodland Trust Scotland (2916): Request that the provision of a Buffer strip be proposed between development site and adjacent ancient woodland in the Development Requirements for this site.

SEPA (3572): none stated.

**MAR 002 Sweetbank Park Terrace**

Markinch Community Council (1484): Reduce the number of units for this proposal.

SEPA (3573): none stated.

#### Sites (not in the Proposed FIFEplan) proposed by Objectors

**Candidate Site LDP-MAR001**

Taylor Wimpey (1211): Allocate site at Barnslee in FIFEplan for housing development.

Markinch Community Council (1478): none stated.

**Site at The Glebe, Brunton Road**

Lomond Homes (846): Allocate site at Brunton Road in FIFEplan for housing development.

Lorna Ross (1139), Markinch Community Council (1478), Sutherland (1398), Professor Robert Lethbridge (1522), Chris Wands (3118), James Wands (3112): none stated.

**Land west of Croft Crescent**

Luke Mosson (1704): Allocate site at land west of Croft Crescent in FIFEplan for housing development.

### MILTON OF BALGONIE

**MOB 001 Balfour Place/Main Street**

Henry Maxwell (41), Robert Farmer (382): Delete site MOB 001 from FIFEplan.
Balgonie Estates Limited (2077): Increase capacity of this site in line with a masterplan approach to site development.

Milton & Coaltown of Balgonie Community Council (2834), SEPA (3579): none stated.

STAR OF MARKINCH

SOM 001 West End Dairy

Mr & Mrs McLaughlin (130), Peter Fleming (83), Angela Clark (85), Lorraine Fleming (212 & 138), Doreen Whittaker (136), Thomas Wright (377), Hannah Wright (464), Alan Mitchell (506), James Aitken (657), Billy Allen (1302), Gwen Allen (1232), Don Gibson (1452), Deborah Klein (1343), Douglas Stewart (1383), Lyndsey Schaller (1520), Anne Schaller (1535), Marion Gray (1668 & 1697), Alison Gibson (1871 & 2048), Peter & Anne Wood (1772 & 1781), Angela Thomson (1798), Catharine Jones (2179), Michael Ironside (2229), Thomas Whitton (2248), Mark Thomson (2324), Jennifer Adamson (2322), Ross Carlin (2408), James Thomson (3357), Moira Thomson (3528), Kingdom Housing Association (1188): Delete proposal SOM 001 from FIFEplan.

J Rutherford (2056): none stated.

Sites (not in the Proposed FIFEplan) proposed by Objectors

Kingdom Housing Association (1197): Allocate site at Plunkie Farm for housing development in FIFEplan.

Mr Peter Fleming (1795), Ms Deborah Klein (1658), Mrs Lorraine Fleming (2235) and Ross Carlin (2409): none stated.

Summary of responses (including reasons) by planning authority:

COALTOWN OF BALGONIE

Coaltown of Balgonie Issues, CLB 001 Coaltown of Balgonie east, CLB 002 Land to the north of Pytree Road & CLB 003 North of Main Street

P F B Paterson (19), Andy Piatkowski (2831 & 2832): Scottish Water’s asset base is categorised into the following four parts:

- Part 1 Assets: Connections from individual properties to a water main or sewer.
- Part 2 Assets: Water mains and sewers that connect developments to trunk mains and trunk sewers, and some sustainable drainage systems (Suds).
- Part 3 Assets: Local bulk infrastructure such as trunk mains and trunk sewers, water service reservoirs, waste water pumping stations and some Suds.
- Part 4 Assets: Strategic assets such as raw water intakes, water treatment works, and waste water treatment works.

Scottish Water acknowledges that in some areas the capacity at its treatment works and existing network is insufficient to accommodate additional development without network reinforcement.
Should there be insufficient capacity for development at water or wastewater treatment works (Part 4 Assets), Scottish Water will provide additional capacity if the developer can meet the following criteria:

1. The development is supported by the Local Development Plan and has outline or full planning permission;
2. The developer can confirm land ownership or control through a solicitor’s letter;
3. The developer can confirm plans are in place to mitigate any network constraints that will be created by the development through a Minute of Agreement with Scottish Water or alternatively a letter showing commitment to mitigate network impact through Part 3 investment;
4. The developer confirms any time remaining on current planning permissions with Fife Council; and
5. The developer can demonstrate reasonable proposals in terms of the development’s annual build rate.

On receipt of these criteria, Scottish Water will instigate a growth project to provide additional Part 4 capacity for development. Scottish Water will also work with SEPA, the Developer and Fife Council to identify solutions to enable development to proceed.

Muir Smith Evans (2073 & 2075): Support for FIFEplan position on sites CLB 001 & CLB 002 is noted.

Milton & Coaltown of Balgonie Community Council (2833): Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision. Detailed matters, such as the specifications of road access and drainage arrangements for example, will be dealt with at planning application stage.

SEPA (3327): Support for FIFEplan position on CLB 003 is noted.

Sites (not in the Proposed FIFEplan) proposed by Objectors

Candidate Site LDP-COB002

Persimmon Homes (1661): The site has not been allocated as its development would not comply with the strategy of the Proposed Local Development Plan, as the focus of growth is in the Ore/Upper Leven Valley area. The site is on prime agricultural land as such development on prime agricultural land should not be permitted unless it is an essential component of the settlement strategy or is necessary to meet an established need, for example for major infrastructure development, where no other suitable site is available. This site has poor integration into the town as the housing sites to the north have not been developed yet, resulting in this site being further detached from the settlement. Development would affect the landscape setting of the south of the settlement. Coaltown of Balgonie already has three unimplemented housing allocations within the settlement of varying sizes. It is considered that these allocations meet the requirement at the present time and provide a good range of locations and site sizes within the area. The site doesn’t fit in with the existing character, scale and form of the village. Proposal unacceptably compromises ridge/slopes to North of Coaltown of
Balgonie, which screen the village from the north and provide containment/separation between Eastfield Industrial Estate and Coaltown of Balgonie.

**GLENROTHES**

**Glenrothes issues**

TMS Planning Ltd (572): Comments noted. Fife Council considers that there may be merit in this objection, as regards the removal of this site from the established employment area, and invites the Reporter to make an appropriate recommendation on this issue.

NHS Fife (3846): Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision.

**GLE 001 Balgeddie Riding School**

Persimmon Homes (1973): the 2014 Housing Land Audit provides the up to date position with regards the phasing of housing numbers, the number of completed houses on this site and how many units are remaining (see Core Document CD11, page 47).

The Woodland Trust Scotland (2893: This site has planning permission and is currently under construction.

**GLE 002 Lochtybridge**

Raith Developments Limited (1284): The open space designation is to provide separation between Thornton and Glenrothes and to stop coalescence of these settlements.

Persimmon Homes (1975): the 2014 Housing Land Audit provides the up to date position with regards the phasing of housing numbers, the number of completed houses on this site and how many units are remaining (see Core Document CD11, page 47).

**GLE 003 Viewfield, GLE 026 Westwood Park & GLE 028 Stenton**

SEPA (3405, 3455 & 3457): Support for FIFEplan position is noted.

**GLE 004 Land to the south of Cadham Road**

Liam Mason (1389), Morris Brown (2227), Michael Adamson (2255), Owner Occupier (2188), Vicky Crooks (2269), Marguerite Ferguson (3665), North Glenrothes Community Council (3704): The principle for development on this site was set through the adopted Mid Fife Local Plan examination. The Development Requirements for this site the primary access to this site should be from the Tullis Russell roundabout. Development here should provide a green network along the southern edge of the site by the riverside.

SEPA (3407): Support for FIFEplan position is noted.
Tullis Russell (1077): A secondary access via the A92 Markinch roundabout off the Tullis Russell access (not direct from the roundabout) should be investigated through any planning application.

**GLE 005 Whitehill Industrial Estate**

Robert Hutchison (153): Support for FIFEplan position is noted.

**GLE 006 Crompton Road East, GLE 008 Crompton Road West, GLE 009 Dalton Road 1, GLE 019 Land south of Fife Airport, GLE 020 Southfield South East, GLE 021 Spectrogon, Southfield Industrial Estate & GLE 023 Whitworth Road**

SEPA (3408, 3409, 3410, 3413, 3451, 3452 & 3454): Support for FIFEplan position is noted.

**GLE 010 Dalton Road 2**

SEPA (3412): Support for FIFEplan position is noted.

**GLE 029 North Street/Falkland Gate**

Glenrothes Areas Futures Group (1318): Support for FIFEplan position is noted.

**GLE 030 Queensgate**

Tullis Russell (1219): Comments noted. This site benefits from an outline planning consent for Bulky Goods retailing. Residential use is not compliant with the Use Classes that are designated in secondary shopping area as per Policy 5 and are not compatible with the surrounding retail and employment uses. Class 3 (food & drink) use is compliant with the retail use classes allowed in secondary shopping areas.

**GLE 031 Albany Gate, GLE 032 Marchmont Gate, GLE 033 South Street Car Parks & GLE 034 North Street redevelopment**

Glenrothes Areas Futures Group (1320, 1321, 1322 & 1323): Comments noted. Fife Council, through the Town Centre Action Programme, is actively working with the Kingdom Centre owners to improve the town centre offering.

**GLE 036 A92 Route Strategy improvements**

Transport Scotland (3220): Policy 4 Planning Obligations of FIFEplan sets out the requirements for all new development including Strategic Transport improvements in which the Council will seek appropriate contributions from developers towards adequate infrastructure. The Council will seek either the direct provision of requirements by developers or contributions towards their cost if these are to be provided by others. Potential interventions, including The A92 corridor at North Glenrothes, are detailed further within the Planning Obligations Guidance. Transport Scotland supports this stance. Taking all of this into account, Fife Council considers that there is merit in the proposed wording put forward by Transport Scotland to be included within the Development Requirements for this proposal, and invites the Reporter to make an appropriate recommendation on this issue.
Liam Mason (2111): Support for FIFEplan position is noted.

Sites (not in the Proposed FIFEplan) proposed by Objectors

Candidate Site LDP-GLE002 – Milldeans

Mr and Mrs Alistair Cochrane (704), Hallam Land Management (2987):
The Proposed Local Development Plan allocates land for housing across the Kirkcaldy, Glenrothes & Central Fife Housing Market Area, sufficient to meet statutory requirements. Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with in Issue 2B Homes. All sites identified for housing development in the Proposed Local Development Plan have been the subject of site assessments. There are significant road access issues related to the development of the site. Rosemount Road itself is a single point of access off Golf Course Road serving the Newcastle area (over 400 houses plus primary school). Unless a secondary access point was possible from Newcastle to the wider road network, Fife Council will not support development of this site. The site is challenging in terms of integration with the rest of Glenrothes and its facilities and services.

Susan Ramsay (71), Janet Reid (128), John Ramsay (112), Sharon Middleton (113), Sharon Middleton (114), David Reid (117), Robert Hutchison (152), Pat Atkin (260), Nicola Wallace (255), Edith Sheerins (264), Brian Sheerins (554, 2167, 2183), Frank McCann (838 & 839), John Vance (741 & 742), Isa Vance (738, 739 & 740), Rosalind Fielder (802), Fiona Beveridge (743), Alf and Doreen Downie (683), William Ramsay (697), Cheryl McCann (841), Joe McCann (843), Ryan McCann (844), Joanna McDaid (1428), Liam Fraser (1660), Katy Fraser (1659), John Wallace (1611, 2012 & 2009) and 330 signature petition: Support for the FIFEplan position is noted.

KINGLASSIE

Kinglassie Issues

Kinglassie Community Council (2716): Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision. Detailed matters, such as the specifications of road access and drainage arrangements for example, will be dealt with at planning application stage.

KLS 001 Laurence Park South

Jane Clement (1525): As response to Kinglassie Community Council (2716), immediately above.

SEPA (3535): Support for FIFEplan position is noted.
LES 001 Leslie House

SEPA (3257): Comments noted. Fife Council considers that there may be merit in expanding the developer requirements to specify the need for a flood risk assessment and to ensure that no built development takes place on the functional flood plain (or within an area of known flood risk), which will help promote a sustainable approach to managing flood risk. The Reporter is invited to make an appropriate recommendation on this matter.

LES 002 Prinlaws Mill and LES 003 South of Walkerton Drive

CWP (725 & 726), Kingdom Housing Association (1184 & 1186): Sites LES 002 & 003 are housing opportunity sites, not housing sites, so they don’t contribute fully to the housing land supply. These sites are also subject to a live planning application for residential use (14/02690/FULL).

SEPA (3546 & 3548): Support for FIFEplan position is noted.

Sites (not in the Proposed FIFEplan) proposed by objectors

Candidate sites LDP-LES001 and LDP-LES003

CWP (692), Kingdom Housing Association (1194): The Proposed Local Development Plan allocates land for housing across the Kirkcaldy, Glenrothes & Central Fife Housing Market Area, sufficient to meet statutory requirements. Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with in Issue 2B Homes Schedule 4 (2B). All sites identified for housing development in the Proposed Local Development Plan have been the subject of site assessments. Development to the north of the A911 in this location would compromise the setting/relationship of Leslie and the slopes of the Lomonds. Also the site is within a Local Landscape Area. A Flood Risk Assessment would be required to assess risk from the spring on northern boundary as well as the Camby Burn. The site has poor integration into the settlement and is cut off by the cemetery to the east. Sites LES 002 & 003 are housing opportunity sites not housing sites so they don’t contribute fully to the housing land supply. These sites are also subject to a live planning application for residential use (14/02690/FULL)

MARKINCH

Markinch issues

Markinch Community Council (1478): Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be “on-demand” provision or upgrades to existing provision. Detailed matters, such as the specifications of road access and drainage arrangements for example, will be dealt with at planning application stage.
MAR 001 Markinch South

Miller/King Ltd (662): Comments noted. Fife Council recognises that part of the site is undevelopable and agrees that part of this site should be removed. By removing this part of land it will help create a buffer between Markinch and Glenrothes. Part of this housing site, whilst not having been in use for a number of years (Sappi Graphics left in 2001) did have the last known use as business. This was recognised in the wording of the Adopted Local Plan – Mid Fife LP. As part of the masterplan process the opportunity also exists to relocate the existing employment uses (highlighted on the map with the hatched circle – see Core Document CD7, proposal MAR02) within the greater site if this aids the development of the site. Due to the recognition of previous employment uses on the site, the wording of FIFEplan reflected this previous use to ensure the appropriate supply of employment land within Markinch.

The residential capacity of the site has been questioned by Miller King Markinch Ltd. Both the adopted and proposed plan gives a capacity of 350 homes. There is a requirement for landscaping, buffer zones and screening to avoid coalescence and as a barrier to the A911, therefore it is recognised that a reduced capacity of approx. 200 units may be more realistic. The stated requirement of 2ha of serviced employment land may therefore be reduced pro rate to the capacity of the housing site. It is suggested that the requirement could be reduced to 1ha of serviced employment land. (2.5acres).

Taking all of the above into account, Fife Council considers that there is merit in the reducing the boundary of the site to remove the undevelopable land, thus reducing the amount of employment land required to 1ha, and invites the Reporter to make an appropriate recommendation on this issue.

Markinch Community Council (1481): Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision. Detailed matters, such as the specifications of road access and drainage arrangements for example, will be dealt with at planning application stage. Support from some Markinch residents for the FIFEplan position is noted.

The Woodland Trust Scotland (2916): The Development Requirements for this site already sets out the requirement for buffer strips to be provided.

SEPA (3572): Support for the FIFEplan position is noted.

MAR 002 Sweetbank Park Terrace

Markinch Community Council (1484): Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision. Detailed matters, such as the specifications of road access and drainage arrangements for example, will be dealt with at planning application stage.
<table>
<thead>
<tr>
<th>SEPA (3573): Support for the FIFEplan position is noted.</th>
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<tbody>
<tr>
<td>Sites (not in the Proposed FIFEplan) proposed by Objectors</td>
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<tr>
<td>Candidate Site LDP-MAR001</td>
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<tr>
<td>Taylor Wimpey (1211): The Proposed Local Development Plan allocates land for housing across the Kirkcaldy, Glenrothes &amp; Central Fife Housing Market Area, sufficient to meet statutory requirements. Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with in Issue 2B Homes. All sites identified for housing development in the Proposed Local Development Plan have been the subject of site assessments. The site at Barnslee does not integrate well with the existing settlement due to the railway embankment. No vehicular access is available through the railway embankment and access to the site would have to be taken from David Douglas Avenue. The site has a history of flooding and there are built heritage concerns with regards to development on this site due prehistoric crop marks &amp; pit alignments on site. This site is underlain by coal and prior extraction of coal would have to be facilitated and encouraged for such a substantial new development site, in line with national policy aimed at preventing sterilisations of coal. In response to comments about effectiveness of sites in the housing supply, there is already a large scale housing site allocated in Markinch that meets the tests of effectiveness as set out in Planning Advice Note 2/2010 Affordable Housing and Housing Land Audits.</td>
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<td>Markinch Community Council (1478): Support for the FIFEplan position is noted.</td>
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<tr>
<td>Site at The Glebe, Brunton Road</td>
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<tr>
<td>Lomond Homes (846): The site at Brunton Road has been in Local Plans since the early 1990s and has never been developed, even when it has benefited from a planning consent. The site is currently in the hands of administrators and does not meet the test of effectiveness as set out in PAN2/2010.</td>
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<tr>
<td>Lorna Ross (1139), Markinch Community Council (1478), Sutherland (1398), Professor Robert Lethbridge (1522), Chris Wands (3118) &amp; Mr James Wands (3112): Support for the FIFEplan position is noted.</td>
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<tr>
<td>Land west of Croft Crescent</td>
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<tr>
<td>Luke Mosson (1704): This site sits within the settlement boundary of Glenrothes and is zoned as open space. Development aspirations here would more appropriately be tested under existing planning policies through a planning application.</td>
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<tr>
<td>MILTON OF BALGONIE</td>
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<tr>
<td>MOB 001 Balfour Place/Main Street</td>
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<td>Henry Maxwell (41), Robert Farmer (382): Fife Council has a statutory duty to ensure that the FIFEplan Local Development Plan (LDP) conforms to the TAYplan/SESplan Strategic Development Plan before it can be adopted. The Council must maintain at least a 5 year effective housing land supply in the Kirkcaldy, Glenrothes &amp; Central Fife</td>
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</table>

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Housing Market Area, and the Local Development Plan should identify sufficient sites to meet the housing land requirement for 10 years as detailed in the TAYplan/SESplan Strategic Development Plan. Allocating a generous supply of land for housing across the Housing Market Areas in the Local Development Plan gives the flexibility necessary for the continued delivery of new housing should unpredictable changes to the effective housing land supply occur during the lifetime of the Local Development Plan.

Balgonie Estates Limited (2077): Support for allocation of this site is noted. Fife Council considers that there is merit in the contention that the final numbers for this site should be informed by a masterplan approach to delivery of the site, and invites the Reporter to make an appropriate recommendation on this matter.

Milton & Coaltown of Balgonie Community Council (2834): Comments noted and these issues will be addressed as part of the Development Management process.

SEPA (3579): Support for the FIFEplan position is noted.

**STAR OF MARKINCH**

SOM 001 West End Dairy

Mr & Mrs McLaughlin (130), Peter Fleming (83), Angela Clark (85), Lorraine Fleming (212 & 138), Doreen Whittaker (136), Thomas Wright (377), Hannah Wright (464), Alan Mitchell (506), James Aitken (657), Billy Allen (1302), Gwen Allen (1232), Don Gibson (1452), Deborah Klein (1343), Douglas Stewart (1383), Lyndsey Schaller (1520), Anne Schaller (1535), Marion Gray (1668 & 1697), Alison Gibson (1871 & 2048), Peter & Anne Wood (1772 & 1781), Angela Thomson (1798), Catharine Jones (2179), Michael Ironside (2229), Thomas Whitton (2248), Mark Thomson (2324), Jennifer Adamson (2322), Ross Carlin (2408), James Thomson (3357), Moira Thomson (3528), Kingdom Housing Association (1188): Fife Council has a statutory duty to ensure that the FIFEplan Local Development Plan (LDP) conforms to the TAYplan/SESplan Strategic Development Plan before it can be adopted. The Council must maintain at least a 5 year effective housing land supply in the Kirkcaldy, Glenrothes & Central Fife Housing Market Area, and the Local Development Plan should identify sufficient sites to meet the housing land requirement for 10 years as detailed in the TAYplan/SESplan Strategic Development Plan. Allocating a generous supply of land for housing across the Housing Market Areas in the Local Development Plan gives the flexibility necessary for the continued delivery of new housing should unpredictable changes to the effective housing land supply occur during the lifetime of the Local Development Plan.

Development of this site, which represents small scale development, is consistent with TAYplan/SESplan strategy. The site could contribute 20 houses towards meeting the SESplan housing land requirement. Specific comments on access/ drainage/ landscape etc. can be addressed by referring to requirement for submission of a Transport Assessment, Flood Risk Assessment, boundary treatments/ design/layout at planning application stage.

J Rutherford (2056): Support for FIFEplan position is noted.

Sites (not in the Proposed FIFEplan) proposed by Objectors

Kingdom Housing Association (1197): The Proposed Local Development Plan allocates
land for housing across the Kirkcaldy, Glenrothes & Central Fife Housing Market Area, sufficient to meet statutory requirements. Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with in Issue 2B Homes. All sites identified for housing development in the Proposed Local Development Plan have been the subject of site assessments and will meet the test of effectiveness as set out in Planning Advice Note 2/2010 Affordable Housing and Housing Land Audits. The Star of Markinch area is outwith the strategic development areas identified in SESplan. The scale of new housing allocations in the area should therefore represent more local scale development to meet local needs. An alternative effective small scale site has been identified in Star of Markinch. It is considered that this allocation meets the local requirement at the present time within the area. At this time, there is no need to allocate, for housing, the site which is the subject to this representation. The site at Plunkie Farm has transportation issues as this site does not comply with Designing Street guidance. The site does not fit well with the existing settlement pattern.

Peter Fleming (1795), Deborah Klein (1658), Lorraine Fleming (2235), Ross Carlin (2409): Support for FIFEplan position is noted.

**Reporter’s conclusions:**

**GENERAL**

1. NHS Fife has expressed concern that the proposed housing development could have an impact on local healthcare services. Various sites in the Glenrothes area are the subject of particular representations in respect of infrastructure provision and these are referred to in my conclusions.

2. In general, however, discussions with NHS Fife regarding possible impact on healthcare services would no doubt be beneficial. It would be possible for such discussions to take place irrespective of whether they are mentioned in the plan. Accordingly, the proposed plan need not be altered.

**COALTOWN OF BALGONIE**

Water supply in Coaltown of Balgonie

3. Scottish Water has acknowledged the need for network reinforcement to accommodate additional development. In the event that development is proposed where there is insufficient water or wastewater treatment capacity Scottish Water would initiate remedial measures subject to certain criteria being satisfied. Liaison would take place between Scottish Water, the Scottish Environment Protection Agency, the council and the developer.

4. I appreciate the concern expressed in respect of the current water supply, but it is clear that any proposed development would involve a protocol to ensure the necessary water infrastructure is made available. Accordingly, the proposed plan does not require modification.

**Site CLB 001 Coaltown of Balgonie East**

5. The community council does not object to the principle of development but raises
certain detailed issues. Whilst there is no right to a “private” view, the development management process is intended to ensure that the design of the development does not impinge on the residential amenity of neighbouring properties. Matters relating to infrastructure, including water supply (as discussed above), drainage and access also fall to be considered when a detailed design is brought forward. However, at this time, there is no reason to believe that the development of the site would involve insurmountable constraints. In this respect, I note there has been ongoing liaison with service providers. In turn, I conclude that there is no justification to change the proposed plan.

**Site CLB 002 Land to the north of Pyetree Road**

6. A number of detailed issues are raised by the community council: access, the loss of a mature holly tree said to be protected by a tree preservation order, impact on a reputed Roman Road, and water supply.

7. The council has confirmed that the holly tree is not the subject of a preservation order but that it is protected under a condition of the planning permission approving the now-built adjacent development at The Green. It has been further confirmed that the council wishes to retain the holly tree on amenity grounds. This position is difficult to reconcile with the allocation of site CLB 002 for housing as the council has also explained that the access would be via an extension of The Green resulting in the inevitable loss of the tree.

8. This problem has been raised previously as site CLB 002 has been allocated for housing in the two preceding local plans and planning permission has been sought for residential development. Permission was refused, one of the reasons being the impact on the holly tree. A subsequent appeal was dismissed but this was on the basis of design and the holly tree was not the determining factor.

9. I recognise the holly tree is important locally. However, I do not believe the tree to be an outstanding specimen or vital to the landscape setting of the vicinity. I note that, until the granting of planning permission for The Green, no formal action had been promoted to secure preservation. I also note with interest the report on the planning application that was subsequently refused stated “…it has to be accepted that the holly tree’s protection was to be a temporary expedient until the future development of this application site took place.” In view of the residential allocation of the land and the design of The Green, that approach seems to me to be pragmatic.

10. All-in-all, I do not consider that this long-standing residential allocation should be deleted from the proposed plan because of any constraining influence of the holly tree.

11. The council does not believe Pyetree Road to be a Roman road. It has no statutory protection and has no implications for the development of site CLB 002. In turn, I conclude that Pyetree Road does not represent a constraint to the development of the site.

12. I have considered water supply previously and I am satisfied that appropriate liaison has been undertaken and any necessary infrastructure could be provided to support the development of the site.

13. No modification of the proposed plan is required in respect of site CLB 002.
Site CLB 003 Land north of Main Street

14. The council has confirmed that it is proposed to gain access to the site via Queens Meadow which is a cul-de-sac already serving a development of some 40 houses. The road meets the council’s Transportation Development Guidelines being of a standard suitable for extension into the proposed site with an estimated capacity of 50 houses. The visibility splays with the B9130 are considered to be acceptable.

15. I attach weight to the transportation officers’ assessment of the potential access. I also note the access road is assessed to currently experience only light traffic. Clearly, extension to serve an additional 50 houses would increase traffic levels but I do not believe the impact on either safety or amenity would be at a level to justify the deletion of the proposed housing allocation.

16. Because of the poor standard, it is not intended to use School Road as a vehicular access to the site although pedestrian and cycling links could be provided. An untoward impact on the primary school and the annex would therefore not result from the development.

17. The site would share two of the boundaries of the primary school but I do not regard this as an inhibiting consideration. I have no indication that additional land is required to increase the playground area or that there are any plans to extend the school.

18. All-in-all, I conclude that allocation CLB 003 is justified and the proposed plan does not require any change in this respect.

Candidate site LDP-COB002 Land east of Blackwood Road and north of Main Street

19. Coaltown of Balgonie is a distinct settlement and, although lying close to the eastern boundary of Glenrothes, there is nevertheless a small but clear physical and visual separation. This separation is achieved by the Black Wood and the adjacent agricultural land between the trees and the westernmost houses of Coaltown of Balgonie.

20. The area of proposed housing within the overall area of site LDP-COB002 has been reduced to extend no further west than the houses fronting Main Street, Coaltown of Balgonie, in the belief that this would not lead to coalescence. To the west, the woodland would be retained and “greenspace/public open space” would be provided. However, the principal residential street into the new development would be from a junction with Blackwood Road, south of Black Wood itself, crossing the open space to the proposed houses. In my opinion, this would change the character of the existing agricultural land and the sense of separation between Coaltown of Balgonie and Glenrothes would be essentially lost. The landscape setting of the settlement would suffer an adverse impact and the individual identity of Coaltown of Balgonie would be significantly weakened.

21. I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the 5-year effective housing land supply for the SESplan area of Fife. However, I also acknowledge the uncertainties expressed under Issue 2(b) with regard to the level of this shortfall. In any event, three housing sites are already allocated in Coaltown of Balgonie which, in total, have an estimated capacity of 161 houses. I agree with the council that
these sites provide the potential for a range and choice of new housing. I am of the opinion that, compared with candidate site LDP-COB002, the development of the three allocated sites would have significantly less of an impact on the character of the settlement in terms of both the disposition of the sites and the scale of development. On this basis, despite the wider housing land supply context, I conclude there is no justification for the allocation of this site for residential development.

22. I also recognise that in various respects the candidate site could be regarded as effective but I do not believe it would meet the land use component of the effectiveness test. All-in-all, I conclude the proposed plan should not be changed in respect of this site.

GLENROTHES

Site GLE 001 Balgeddie Riding School

23. The construction of this site has commenced although currently work appears to be in abeyance. Nevertheless, the proposed plan is clear in providing an estimated capacity of 72 houses. The annual housing land audit provides details on the rate of progress and indicates the number of houses completed along with those remaining. On this basis, no change is necessary to the proposed plan.

24. Although The Woodland Trust Scotland is concerned about the impact on ancient woodland, it is acknowledged that the site is under construction. Clearly, in pragmatic terms, this is a recognition that the planning process has moved forward. The construction of the remaining houses in accordance with the terms of the planning permission must therefore be anticipated in due course. No change to the proposed plan is justified.

Site GLE 002 Lochtybridge

25. The construction of the site is well underway with an estimated capacity of 120 houses. The annual housing land audit provides details on the rate of progress and indicates the number of houses completed along with those remaining. In this respect, no change is necessary to the proposed plan.

26. In terms of the representation seeking a southwards extension of site GLE 002 with a commensurate reduction in the area of protected open space, I have noted the appeal decision dated November 2013 in which a similar proposal was refused planning permission. The reporter identified the potential coalescence of Thornton, to the south, and Glenrothes as a determining issue. He concluded that the proposed development would reduce the gap between the two settlements to an unacceptable width.

27. Responding to the representation, the council again argues the open space designation is intended to provide separation between Thornton and Glenrothes. I agree with both the council and the reporter who determined the appeal that this issue remains an important consideration. Raith Developments Limited has attempted to address the matter by suggesting revised designations with open space retained to the southwest of an enlarged residential allocation along with strips of open space northwards along the B9130 and eastwards along the Lochty Burn.

28. Although the open space would be provided at the point closest to the most northerly houses in Thornton, described in the representation as a “pinch point”, I believe
that the extension of the housing allocation would lead to an unacceptable perception of coalescence. This perception would not be significantly offset by the amount of open space that is now suggested.

29. All-in-all, I conclude that the protected open space allocation is justified and necessary in its role of contributing towards the prevention of the coalescence of Glenrothes and Thornton. The proposed plan should therefore remain unchanged.

Site GLE 004 Land to the south of Cadham Road

30. Located within the urban area, this disused land commends itself to the principle of development. Indeed, this principle has previously been recognised insofar as the site is allocated for housing in the current Mid Fife Local Plan. Nevertheless, the preparation of the local development plan provides an opportunity to review the situation and it is necessary to assess the concerns of those who have made representations objecting to the development of the site. Equally, account must be taken of the submission made by Tullis Russell, the site owners.

31. Although residential use is often appropriate within an existing settlement, it is necessary to take account of the relationship between proposed development and existing neighbouring land uses. In this case it is important to note that the Cadham Conservation Area extends along the north side of Cadham Road, opposite site GLE 004, and, to a limited extent, covers land on the south side of the road. A very small part of site GLE 004 is within the boundary of the conservation area.

32. Regard must be had to the need to preserve or enhance the character or appearance of the conservation area. However, it is not unusual for conservation areas within an urban setting to be surrounded by development that does not have conservation area designation. In such instances, careful development management is necessary to ensure the conservation area retains its special characteristics. In this case, the Conservation Area Appraisal explains that the houses in the conservation area were constructed during the 1920s as a “garden suburb” for those employed in the nearby paper mills.

33. For the most part, the development of site GLE 004 would be on the opposite side of Cadham Road to the conservation area. The land slopes markedly downwards away from the conservation area and I consider it would be possible to devise a layout and design that would have no significant adverse impact on the character or appearance of that part of the conservation area to the north of the road. The small section of the conservation area to the south of the road would require particular attention in terms of the design of any new development, especially that small section of site GLE 004 lying within the conservation area. Nevertheless, I am confident that it would be possible to achieve an acceptable design solution.

34. The value of the site in terms of natural heritage has been raised by a number of those making representations. Reference has been made to birds, bats and various other mammals. I can accept that an uncultivated and unmaintained area such as this attracts wildlife. Indeed, during my site inspection, I observed both buzzards and kestrels.

35. Despite the concern about the value of the site for nature conservation, the land carries no formal designation and the allocation is not the subject of adverse comments.
by Scottish Natural Heritage or any other nature conservation authority. However, certain species, including bats and otters, are subject to statutory protection under the Habitats Regulations. This would be an important consideration in the preparation of any development proposals. In concluding that natural heritage concerns are not an overriding constraint to development, I disagree with the suggestion that the site should be re-instated for agricultural use with protection for wildlife. This would not be a practical or justified course of action.

36. I note that the proposed plan requires a buffer strip between the watercourse and the built development and that a green network should be provided along the southern edge of the site. These stipulations would be of benefit to nature conservation in providing a link between major areas of protected open space to the east and west of the site. However, I consider the width of the buffer strip should not be specified as six metres. Instead, there should be a requirement for the developer to undertake a conservation study and provide a wildlife corridor of an appropriate width along the river bank from the east to the west of the site. The “appropriate width” would be determined in consultation with the relevant natural heritage organisations and it would be for the council to address the matter as part of the development management process.

37. As part of the plan preparation process the council has confirmed that it has maintained ongoing discussion with its development partners. On this basis, the provision of supporting infrastructure for any particular site is not regarded as an insurmountable constraint. In turn, in respect of primary school places required should the development of site GLE 004 proceed, I have no reason to believe that appropriate provision could not be made. In any event, the proposed plan includes a policy basis for developers to make appropriate contributions towards infrastructure.

38. A number of representations argue that an access to the site should not be taken from Cadham Road. They prefer access from the roundabout to the east of the site and, indeed, the proposed plan states “Primary access to this site should be from the A92 Markinch roundabout…” On the other hand, the current Mid Fife Local Plan indicates that access should be taken from “the local road network”. Taking guidance from the local plan, Tullis Russell prepared a development strategy with the primary access taken from Cadham Road, as part of the local road network. It is argued by Tullis Russell that there is no basis or justification for the access to be taken from the A92.

39. The council has explained that, at the time the previous local plan was prepared, Transport Scotland opposed access from the A92 Markinch roundabout and this was reflected in the Mid Fife Local Plan. However, support for access from the roundabout was confirmed by Transport Scotland during the preparation of the proposed local development plan and the development requirements for site GLE 004 reflect the current situation.

40. The council has further indicated that, in terms of the principles set out in Designing Streets, the site should be served by “multiple” access points. In effect, states the council, this requires the primary access via the A92 Markinch roundabout, off the Tullis Russell access (that is, not directly from the roundabout), with a secondary access from Cadham Road. The council also argues that, in addition to increasing connectivity, this arrangement would reduce the potential level of traffic using the substandard junction between the A92 and Cadham Road.

41. I note the access arrangement set out in the Tullis Russell Transport Strategy
shows both primary and emergency accesses from Cadham Road. This conforms to the requirements of the current local plan. However, as Transport Scotland is now prepared to accept a layout which would provide an access via the A92 roundabout it is possible to devise a layout that would meet the multiple access point requirement of Designing Streets. In particular, this would involve an access leading from the roundabout and a further, secondary, access to Cadham Road. I consider that this arrangement would improve the connectivity of the site and is also likely to fulfil the council’s hope of a reduced level of traffic using the junction between the A92 and Cadham Road.

42. Overall, I conclude that the various concerns in respect of impact on the conservation area and natural heritage do not justify the deletion of the residential allocation. I have some sympathy with those concerned about access to Cadham Road but believe that this would be acceptable provided the primary access is, indirectly, via the Markinch roundabout. I appreciate that altered access requirements included in the proposed plan could lead to a wider re-assessment of the development potential but, nevertheless, I consider that the revised approach is significantly preferable. In turn, I support the amended access specified as a development requirement. Accordingly, the proposed plan should be modified only in respect of the width of the buffer strip.

Site GLE 030 Queensgate

43. For the most part, site GLE 030 is located within a designated secondary shopping area. Although the council points out that outline planning permission (as then known) has been granted for bulky goods retailing, the implementation of that permission cannot be guaranteed. On this basis, I agree it is appropriate for the proposed plan to indicate the uses for the site that are considered to be acceptable. In turn, Policy 5, Schedule 6.5, provides guidance on acceptable uses in town centre framework areas. As the council explains, Class 3, Food and Drink, is shown to be acceptable in the Glenrothes secondary shopping area. There therefore is no requirement to specify this use within the settlement plan entry.

44. Residential use is not identified as being acceptable in Schedule 6.5. Although housing is shown as an acceptable use in the wider central area in Glenrothes, I agree that it would not be suitable within the secondary shopping area, particularly on the land allocated under GLE 030. In my opinion, the proximity of the site to retail and employment uses to the north, south and east would not be conducive to creating a satisfactory residential environment. The approach roads reflect the commercial character of the vicinity and would further detract from the attraction of the site for residential use. Accordingly, I conclude that the proposed plan should not be changed to include residential use as a development opportunity within site GLE 030.

GLE 036 A92 Route strategy improvements

45. Transport Scotland has recommended an addition to the text to explain the current situation in respect of plans, funding and delivery of improvements to the A92. I agree with the council that there is merit in the inclusion of the additional statement to provide more clarity. The reference to the need for discussions with Transport Scotland is in accordance with the guidance contained in Scottish Planning Policy.

46. It has been suggested that a 30mph speed limit might be appropriate along part of the A92 but this is not a matter for inclusion in the local plan. Proposed changes to speed limits are promoted through other legislation.
Candidate site LDP-GLE002 Milldeans

47. The candidate site extends to some 33 hectares. Lying to the immediate west of the Glenrothes settlement boundary, the land is mainly in agricultural use. A masterplan approach to development is intended.

48. The site illustrated in the supporting documents shows the eastern half of site LDP-GLE002 and indicates that this part of the site has an indicative capacity of some 300 houses, of which 15% would be in the affordable category.

49. Three access points from Rosemount Avenue are envisaged, including a new roundabout at the most western of the accesses.

50. In a wider context, it has been argued by Hallam Land Management Ltd that the development of the site would make a much needed contribution to the housing land supply requirements identified in SESplan. In this respect, I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the 5-year effective housing land supply for the SESplan area of Fife. However, I also acknowledge the uncertainties expressed under Issue 2(b) Homes, with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that this site would nevertheless be unacceptable because the adverse impacts identified would outweigh the benefits of addressing any shortfall.

51. I find that this site should not be allocated at this time, particularly because of uncertainties over access. Despite the three access points from Rosemount Road that have been suggested, I share the council’s concern that this road is itself a single point access already serving over 400 houses and a primary school. I therefore appreciate the council’s lack of support for the allocation unless a further secondary access point could be identified.

52. I have noted the concerns expressed in numerous representations supporting the non-allocation of this site for housing purposes. Irrespective of the single access, the potential size of the development has led to fears about the scale of impact on the local community. This is a further aspect of the proposal which I believe requires close attention particularly in view of the council’s comments that the site is challenging in terms of integration with the rest of Glenrothes.

53. All-in-all, I recognise that the site has various attributes that meet the test of effectiveness. However, in view of the particular constraints in terms of access and integration, I conclude that the proposed plan should not include the site as a housing land allocation.

Nether Stenton Farm

54. Although located within a large allocation of safeguarded employment land with employment sites GLE 009 and GLE 020 to the north and south respectively, Nether Stenton Farm clearly does not fall within an “employment land” category. Although access is gained via the employment land, the site itself should be removed from the “safeguarded employment area” allocation and re-designated as “white land” within the settlement inset of Glenrothes. The proposed plan should be modified accordingly.
### Impact of new development

55. The council believes that continuing liaison with service providers will ensure that the required level of supporting infrastructure would be available as new development comes forward. The identification of potential deficiencies has already allowed the planning of upgraded provision. Additionally, the proposed plan makes provision for contributions by developers for required infrastructure. Despite the fears of the community council over the impact on infrastructure, I have no evidence to justify an overriding concern in this respect.

56. In terms of the impact of new development on the character of the village, the spatial strategy explains that Kinglassie is a location where additional development has been proposed in the face of “the changing housing context in SESplan.” I recognise the strategic need for additional housing land and accept that sites in comparatively smaller settlements such as Kinglassie have been identified to attempt to satisfy the wider requirement.

57. The two sites allocated for housing in Kinglassie have an estimated capacity of 211 and 14 houses respectively. Although the community council is concerned about the impact on “the small, friendly” character of the village, I have no clear evidence that there would be the feared adverse effect. Whilst site KLS 001, especially, represents a significant eastern expansion of Kinglassie, a phased development should ensure steady integration into the village and avoid an overwhelming sudden influx of new residents.

**Sites KLS 001 Laurence Park South and KLS 002 Laurence Park North**

58. I can appreciate concern that the development of the two sites could exacerbate what appears to be an existing and ongoing flooding problem. Site KLS 001 specifies the need for a flood risk assessment as a development requirement. This is a sensible approach and should ensure that potential flooding problems and any necessary mitigation are assessed when development proposals are brought forward.

59. Site KLS 002 does not specify the need for a flood risk assessment. Although the site is small, the local topography could have flooding implications for any future development. It would therefore be appropriate to include a flood risk assessment as a development requirement. This precautionary requirement should be inserted into the proposed plan.

60. Infrastructure implications arising from the development of the two sites have been considered above. As explained by the council, matters of layout and design, including access arrangements, can be dealt with through the development management process when detailed proposals are brought forward. At this time, however, I have no reason to believe that any matter of this nature would prove to be an insurmountable constraint to the development of either site.
PROPOSED FIFE LOCAL DEVELOPMENT PLAN

** LESLIE **

**Site LES 001, Leslie House**

61. The council has explained that planning permission and listed building consent was granted to allow the conversion of Leslie House to flats and the construction of houses in the grounds. The council accepts that the requirement for a flood risk assessment could not be applied retrospectively. However, although work commenced on the conversion in 2008, it has been in abeyance since a major fire occurred in 2009.

62. Despite the circumstances, the council accepts the Scottish Environment Protection Agency has made a valid case for requiring a flood risk assessment.

63. On the basis of the information provided, I agree it would be appropriate to add a flood risk assessment requirement to site LES 001. In view of the current situation, it is possible that development may not progress as currently approved and further applications for planning permission and listed building consent may be lodged in the future. Should that be the case, the opportunity should be taken to ensure the preparation of a flood risk assessment. The modification should explain the circumstances under which the requirement applies.

**Sites LES 002 Prinlaws Mill & LES 003 South of Walkerton Drive**

64. Both these sites have been brought forward from the current local plan and are allocated in the proposed plan as “opportunity sites” with the preferred use being housing. Both CWP (Tor Property Developments Ltd) and Kingdom Housing Association express the view that the two sites are non-effective. It is claimed that difficult topography, potential flooding, access problems and impact on nature conservation represent severe constraints on the developable area.

65. The council explains that, as “opportunity” sites, the allocations do not “contribute fully” to the housing land supply. I note that both sites are included in the 2015 Housing Land Audit under Schedule 2, Non-effective sites, and that such sites are estimated to contribute 15% of capacity to the housing land need.

66. I can accept that the sites are challenging in terms of design and layout but I do not believe that this should rule out the continued identification of the sites as development opportunities. Indeed, a current planning application is being considered by the council indicating, at least, that there is an interest in the development of the land. I have taken the opportunity to review the documents submitted to the council with the application and it is clear that much work has been undertaken in the assessment of the sites for development. In these circumstances I am of the opinion that the two allocations should remain and no change in this respect should be made to the proposed plan.

**Candidate site LPD-LES001**

67. The site extends to some 3.2 hectares, adjoins two boundaries of Leslie cemetery and lies adjacent to the settlement boundary to the north-west of the town. The land is designated in the proposed plan as part of a local landscape area.

68. Kingdom Housing Association intends to construct some 36 units on the southern part of the site, half affordable and half private. It is argued that good design would
enhance the entrance to the town whilst the northern part of the site would remain as open space.

69. I have noted the arguments put forward by Kingdom Housing Association to support the development of the site. Indeed, when considering this site, and adjacent land to the west, the report of the examination of the current local plan recognises, “there are many compelling arguments …. in support of providing houses on this site.” The situation has not changed and I agree that this assessment remains valid.

70. However, despite the advantages, the report concludes: “... I consider that the land is integral to the Special Landscape Area, providing an attractive and open setting to both the settlement and the Lomond Hills Regional Park. On the basis of the information submitted I consider that the need to deliver further housing is outweighed by the site’s landscape value. The site should not be allocated for housing and should remain designated as a Special Landscape Area.”

71. Despite the designation in the proposed plan having been changed to local landscape area, I consider the landscape value of the land to have remained at a high level. The continued landscape designation is therefore justified.

72. The council also argues that development at this location would compromise the relationship between the setting of Leslie and the slopes of the Lomond Hills. Despite the landscape and visual impact assessment undertaken on behalf of Kingdom Housing Association, I share both the opinion of the council and the conclusion of the previous local plan report.

73. Although Kingdom Housing Association has claimed that the development of the site would provide an improved entrance to Leslie, I believe that the existing approach is attractive and does not require enhancement.

74. I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the 5-year effective housing land supply for the SESplan area of Fife. However, I also acknowledge the uncertainties expressed under Issue 2(b) Homes, with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that this site would nevertheless be unacceptable because the adverse landscape impacts identified above would outweigh the benefits of addressing any shortfall. All-in-all, therefore, I do not support the allocation of this site for housing purposes and the proposed plan should remain unchanged in this respect.

Candidate site LPD-LES003

75. The site extends to some 4.3 hectares and is located immediately to the west of site LDP-LES001 which is considered above.

76. The owner, CWP (Tor Property Developments Ltd) relies on similar arguments to those presented in support of the housing land allocation of site LDP-LES001. The council’s response also relates to both sites. In turn, my conclusions for this site reflect those for site LDP-LES001: despite any uncertainty in respect of the wider housing land supply, the landscape impact of the development of the site points to the retention of the land within the local landscape area. In any event, insofar as I have decided that site LDP-LES001 should not be allocated for housing, it would be impractical to designate site LPD-LES003 for residential development as this could lead to a relatively isolated
enclave of housing to the north of the A911.

77. Accordingly, I conclude that site LPD-LES003 should not be allocated for residential development.

MARKINCH

Infrastructure

78. The community council believes the level of potential housing development in Markinch could have implications in the provision of infrastructure, particularly in respect of local medical services, primary school capacity, and parking shortfalls. Impact on the local environment is a further concern.

79. I note once more the council’s reference to continuing liaison with service providers and assurances that infrastructure will be available as and when required. Additionally, Policy 4, Planning Obligations, deals with the need for developers to provide contributions towards the upgrading or new provision of required infrastructure. I recognise the need for new development to be supported by adequate infrastructure. However, I have no reason to believe that careful co-ordination of new development and infrastructure could not be achieved.

80. I acknowledge the concern of the community council in terms of the impact of development on the historic environment and how change could lead to the loss of what is described as “traditional ecological knowledge”. Clearly it is necessary to have regard to natural, built and cultural heritage and, indeed, statutory protection exists in many cases. In respect of heritage, the council has undertaken the required consultation in the preparation of the local development plan and has included relevant policies (Policy 12, Flooding and the Water Environment and Policy 13, Natural Environment and Access). I do not consider that it is necessary for the proposed plan to go further than this and, accordingly, no change is warranted.

Site MAR 001 Markinch South

81. The housing land allocation includes a requirement to provide a serviced employment site of two hectares either within the designated area or elsewhere locally. Alternatively, a commuted sum would be available. The northern section of the allocation is said to have ground conditions and constraints precluding the prospect of housing development. The council accepts this contention and has agreed that this section of the site should be deleted from the proposed plan. As there appears to be little prospect of housing development proceeding, I conclude that it would be appropriate to make a change to this effect.

82. The council believes the retention of the deleted part of the site as protected open space contributes to providing a buffer between Markinch and Glenrothes. The deletion of the housing land allocation provides the opportunity to retain the open area between the two communities and I agree with the council’s suggestion that an open space allocation should be applied.

83. The council argues that the reduction in size of site MAR 001 justifies halving the allocation of employment land within the site to one hectare. On the other hand, Miller King Markinch Ltd is concerned that the requirement to provide any employment land is
not justified. I note that the loss of employment from the site took place many years ago and that there are other opportunities for providing employment land uses in the vicinity. The examination has also found that in a wider context there is adequate employment land in Fife.

84. In the Glenrothes area there is a marketable supply greater than the seven-year requirement. On balance, I am prepared to accept that there is no overriding requirement to provide employment land within the site. Equally, I conclude that it is not necessary to provide serviced employment land elsewhere or pay a commuted sum to the council. These references should therefore be deleted.

85. As a consequence of the reduced development area, notwithstanding the removal of the requirement for employment land, it has been argued that the estimated housing capacity of 350 should be reduced. The representation by Miller King Markinch Ltd suggested a range of 150 - 200 units whilst the council considered some 200 houses to be realistic.

86. In the event, an application for planning permission in principle for “Class 9 and flatted” development has been submitted to the council. The stated site area is 15.5 hectares and the indicative masterplan plan shows a capacity of some 250-300 residential units. The council has further commented that the site could support a density of 30 units per hectare but that various constraints would suggest a capacity of about 300 houses without an allocation for employment land. The employment land allocation referred to in the proposed plan would reduce the total to 240. I think it is reasonable for the proposed plan to indicate a revised estimated capacity of 300 housing units.

87. The community council has expressed concerns about the impact on infrastructure should 350 houses be built as shown in the proposed plan. Although I am recommending a reduction in this total, as explained, the council confirms that there has been continuing liaison with service providers and that adequate infrastructure provision is anticipated. I have no reason to believe that the necessary level of infrastructure cannot be made available.

88. In respect of other issues raised by the community council, it is important to note that the proposed plan requires a flood risk assessment. The removal of a significant part of the allocation and retention as open space will reduce any impact on local biodiversity. Indeed, the application for planning permission in principle is accompanied by a range of supporting documents including a flood risk assessment.

89. In response to the representation from the Woodland Trust Scotland, the council points to the need for buffer strips. I note the required buffer strips relate to watercourses. For the avoidance of doubt, I believe it would be appropriate to specify the need for a survey where development is proposed in the proximity of ancient woodland. The development requirements for site MAR 001 should include an appropriate reference.

Site MAR 002 Sweetbank Park Terrace

90. The community council has raised a number of concerns. In terms of density, the proposed capacity is shown to be 38. I consider this to be reasonable for a site of 1.5 hectares at this location. In any event, the final layout and assessment under the
development management process will determine the precise number of units in due course. Should it be determined that an extended 20mph speed limit would be appropriate it would be possible for the council to promote an order in this respect. Any engineering requirements in terms of drainage would require assessment and thereafter put into effect. The proposed plan specifies development requirements related to the water environment and this would involve an assessment of any water features integral to local biodiversity.

91. All-in-all, I am satisfied that the proposed plan makes provision for ensuring a suitable development and does not require to be changed.

Brunton Road

92. This site, also known as “The Glebe”, is allocated for housing in the current Mid Fife Local Plan with an estimated capacity of 15 houses. Indeed, the residential designation appears to have first been included in the 1994 local plan. The Housing Land Audit 2015 includes the site in Schedule 2, Non-effective Housing Land Supply, noting “Developer in administration, planning consent lapsed”.

93. A number of representations point to the history of planning applications and appeals related to the site. Significantly, it is claimed, planning permission has lapsed and the site remains undeveloped. It is suggested that the reason for no houses being built is due to a thick layer of peat and the location of the land within a flood plain. I also note other concerns in respect of inadequate infrastructure, impact on biodiversity, proximity to the conservation area, and practical problems caused by construction traffic.

94. Lomond Homes argues that the principle of development on the site is long and clearly established. Accordingly, it is claimed, the proposed plan should reflect this. On the other hand, the council echoes the view of objectors and contends the long-term allocation of the land for housing has never come to fruition and the site cannot be regarded as effective. In turn, it is argued, the removal of the housing land allocation is justified.

95. In my opinion, the site is virtually infill in nature, closely related to the urban area both physically and visually. I do not find it surprising that the land has retained its allocation for housing over the years. However, I appreciate several significant development considerations have been raised:

- there is concern about lack of infrastructure but, on the basis of the council’s continuing liaison with service providers, I have concluded previously that this should not be regarded as an over-riding constraint; in any event, I note the current local plan requires a contribution towards school provision;
- although the site is adjacent to the northeast section of the conservation area, development should not be ruled out; careful design would be required in order to preserve or enhance the character or appearance of the conservation area; again this is a requirement of the existing local plan;
- concern about the potential for flooding is understandable but the existing local plan development requirements stipulate the need for a flood risk assessment; any such assessment would require to identify the scope for development and the need for any specific mitigation measures;
- no particular evidence has been provided in respect of the natural heritage value of
the site and no formal nature conservation designations apply to the land; I therefore do not regard this as an issue providing an insurmountable constraint;

- matters related to site stability and construction methods are not fundamental to the content of the proposed plan and would require to be considered in detail prior to site development.

96. Comments have been made in respect of land transactions but this is not a matter central to my consideration of appropriate land use.

97. I do not consider that the current local plan allocation should be maintained in the proposed plan as a matter of course. The plan preparation process provides an opportunity for the review of policies and proposals and to consider the various representations in support of and opposing the development of the site.

98. However, of the planning-related matters that have been raised, none leads me to conclude that the use of the site for housing would be unacceptable in planning terms. Nevertheless, I recognise the delays that have occurred despite the granting of planning and, significantly, the inclusion in Schedule 2 of the Housing Land Audit as a non-effective site. I understand an application was lodged during July 2014 seeking “approval of matters specified in conditions”. No decision has yet been made on this application and I am not persuaded that the status of the site could be regarded as “effective”. Nevertheless, I consider it reasonable to allocate the land as a housing opportunity site. This would not preclude residential development taking place should the site become effective. The proposed plan should be modified accordingly. The site boundary and the supporting details should be as contained in the current local plan.

Barnslee (see also Issue 3c, Mid-Fife Area Strategies)

99. The site extends to some 41.6 hectares for which Taylor Wimpey seeks residential allocation in order to construct some 400 houses in five phases. The site is separated from Markinch by the Aberdeen and Fife Circle railway line which constitutes the eastern boundary of the settlement and the western boundary of the site. The southern boundary of the site is formed by the A911 with a high point at the south-east corner and marked slopes into the site away from the road. The land is agricultural being of Class 31 and 32 categories.

100. In a wider context, Taylor Wimpey believes there is a need to identify a significant amount of housing land to meet strategic targets. I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the 5-year effective housing land supply for the SESplan area of Fife. However, I also acknowledge the uncertainties expressed under Issue 2(b) Homes, with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that this site would nevertheless be unacceptable because the adverse landscape impacts resulting from development would outweigh the benefits of addressing any shortfall. On this basis, I do not think that the wider housing land supply considerations provide an over-riding reason for the required allocation.

101. I accept that the site has a number of advantages as described in the statement prepared to support the representation. On the other hand, I share the opinion of the council that the site would not integrate well with Markinch because of the dominance of the intervening railway line. Despite a small ribbon of houses to the south of the A911 and also, further east, the cemetery, I believe the railway provides a very clear settlement boundary. Whilst the topography of the site would allow some visual links, for
instance views of the church spire, inward views of towns and villages from rural surroundings are not uncommon. This does not give those rural areas an urban character or justify development.

102. The topography ensures the site is prominent in the landscape and forms an important component in the setting of Markinch to the east of the town. Development as required, despite the open spaces and planting that is proposed would have an adverse impact on the landscape setting.

103. Whilst the site has a number of the attributes of “effectiveness”, I do not believe that it meets the land use test. Taking all of the above into account, the land should not be allocated for housing.

Croft Crescent

104. Although this representation is considered as a “Markinch issue”, the site lies within the designated settlement boundary of Glenrothes which, at this point, is adjacent to the Markinch settlement boundary. The designation within the proposed plan is “protected open space”.

105. The site is adjacent to the built-up area of Markinch with urban development (Croft Crescent) to the immediate east and to the south (on the opposite side of Balbirnie Street, B9130). Despite this proximity to the built-up area, the site is not of an urban character and more closely relates to the extensive area of mature open space, including established woodland, to the north and west.

106. The council has explained that the site lies within a designed landscape. I note that the Inventory of Gardens and Designed Landscapes indicates that “Balbirnie” is an eighteenth century landscape of high value. It forms part of the Lomond Hills Regional Park and is within the setting of a listed building.

107. The Caravan Club acknowledges the location of the site within the designed landscape but believes mature trees would screen any development and that, in any event, contrary to my opinion, the site is more related to the adjacent houses in Croft Crescent.

108. Recognising the existence of the caravan facility, I accept that it would be possible to design a high quality, low density residential development within the site. However, I am concerned that this would involve a permanent incursion into a designed landscape that is regarded as being of high value. This would be unacceptable and, taking the various considerations into account, I cannot accept that the case for a housing land allocation is justified. Indeed, although the council has indicated that any proposal would be best pursued through a planning application, I note the subsequent assessment that any such application is unlikely to be successful.

109. On the basis of the foregoing, I conclude that no modification to the proposed plan should be made in respect of this site.
110. Local development plans must be consistent with strategic development plans which, in this case, is SESplan. In particular, the proposed plan is required to allocate land to provide for the level of residential development identified in SESplan. To this extent, the allocation of land for housing accords with the provisions of SESplan.

111. It is important to ensure that new residential land allocations have regard to the impact on those areas in which the proposed housing is to be constructed. The character of Milton of Balgonie is an important consideration in this respect. Although it has been suggested that the proposed development would lead to a 63% increase in the size of the village, I do not believe that, in itself, this level of expansion should rule out the housing land allocation. In my opinion, the disposition of the site, in the context of the existing village, provides an opportunity for a housing development that could be integrated without a harmful impact on Milton of Balgonie.

112. Scottish Planning Policy states that the purpose of planning is to create better places and identifies master plans as a tool to guide the quality of development and promote positive change. Reference has been made in this case to the preparation of a master plan and I endorse this approach to layout and design to ensure the wider suitability of the future development of the site. A master plan should establish the design principles to ensure the integration of the development within the village framework. As required by the proposed plan, this approach should have the objective of providing a high quality development. Also, as suggested, it should consider such matters as access to informal open space and countryside recreation.

113. Clearly, the master plan should be focussed on the proposed allocation and although fears have been expressed about the likelihood of further development, this is not a matter for this local development plan examination to consider. It has also been indicated that the number of houses proposed should be finalised through the master plan process. I agree with this approach and therefore do not accept that the proposed plan should indicate an increased estimated capacity of 75 units. The existing estimate of 63 should remain subject, as explained, to the outcome of the master plan exercise.

114. I note the references to past flooding and drainage problems. Importantly, however, there is a stated requirement to undertake a flood risk assessment. In itself, the outcome of this assessment could influence the development potential of the site.

115. A further matter for the master plan to assess is the proximity of the site to the primary school. I do not perceive an intrinsic problem in the juxtaposition of the school and the development site but care should be taken in the design to ensure that no untoward conflict would result from the construction of houses on site MOB 001. It may be that the master plan gives consideration to the control of construction vehicles although this issue is more likely to be assessed in detail through the development management process.

116. Other infrastructure concerns have also been raised and, in this respect, the council has explained that there has been continuing liaison with service providers throughout the plan preparation process. I have no reason to believe that lack of supporting infrastructure provides an insurmountable constraint. In turn, I accept that
these matters should be addressed as progress is made towards the implementation of development.

117. Overall, I conclude that site MOB 001 should be retained within the proposed plan subject to a reference to the preparation of a master plan.

STAR OF MARKINCH

Site SOM 001 West End Dairy

118. Although concern has been expressed about the proposed extension of the village envelope, the preparation of the local development plan provides the opportunity to review land uses in the context of current development requirements. Star of Markinch (more commonly referred to as “Star”) is not within one of the strategic development areas identified in SESplan, but the council has explained that the residential use has been proposed to make a contribution to the wider strategic housing land requirement. The council argues therefore that this site, which is regarded as small-scale, is consistent with SESplan strategy.

119. I accept the proposed plan must be consistent with SESplan and that the site has been brought forward in strategic terms although the size of the potential development would ensure a very limited strategic contribution. On this basis, despite the previous rejection of development on the site, I also accept it is open to the council to now bring the land forward for housing. In turn, the allocation of additional land for development leads to an adjustment of the village envelope.

120. It has been suggested that there is little demand for new houses in the village. The claims to this effect are made in respect of a recent development in the village but, in my opinion, are not conclusive. In this regard I believe there is no compelling evidence to justify the argument that any further new houses would not attract purchasers. Certainly, on the occasions when I visited the village, there was no indication that a large number of properties were being offered for sale.

121. I have noted the concerns about the impact on the character of the village. Star is a linear settlement focussed on the east to west axis of the central road. The houses along the frontage range from the traditional to modern. Footpaths are not continuous on both sides of the road but there are few instances where there is not a footpath on one side of the road or the other. At some points agricultural land extends between the houses to the road and this is part of the village character.

122. The village is not designated as a conservation area and, whilst this does not imply that new development should disregard the character of the settlement, it is not a particular requirement to consider whether development would preserve or enhance character or appearance. I appreciate the concern of those who fear that further development would establish a precedent which would erode or even destroy the character of the village. In this respect I accept that development extending away from the central road could soon have a generally adverse impact. Significant loss of the small open areas adjacent to the road would also be undesirable.

123. On the other hand, villages should not become moribund. It is usually the case that development occurs within or around settlements and this is a continuing process in most, if not all places. Indeed, it is clear that significant development has taken place in
Star over recent years and yet the village retains a clear and distinctive character. On this basis, I do not accept the premise that there should be no further development in the village.

124. The capacity of the proposed development at the western end of Star is estimated in the proposed plan to be twenty houses. Development would remove one of the open areas adjacent to the road but, in my opinion, this is one of the least significant of the undeveloped spaces. The new houses would effectively have existing development on all but the northern boundary which would form the new edge of the village. In my opinion, development at this location would have no significant adverse impact visually. I have no reason to believe that the social composition of the village would suffer. Integration within the village would be improved should the development be phased over several years and, when complete, I do not believe that the scale of the development would have an overwhelming impact on Star.

125. As discussed, the council has explained that the proposed housing development would make a contribution to strategic requirements although I have indicated the contribution would be limited. However, the planned development of this site should not be regarded as a precedent. I acknowledge the strategic purpose of the development and have concluded that the scale is acceptable. This does not imply that any further developments would be regarded in a similar manner. Clearly, any future proposals would require to be assessed on merit in the context of the development plan.

126. Concern has also been expressed about the lack of supporting services but the council has explained that the plan-making process has involved continuing liaison with service providers. In this respect, I have been given no clear reason to think that adequate additional infrastructure is not, or could not be made available to support a further twenty houses. The council also points out that details of any proposed development would be addressed during the preparation of a planning application. Clearly, any potential conflict with power lines, or other existing services, must be addressed when a layout is being prepared.

127. Although it has been suggested that flooding could be a constraint, the Scottish Environment Protection Agency has not objected to the proposed allocation. Nevertheless, should it appear to be necessary, the council could require the preparation of a flood risk assessment. There is currently insufficient information to specify such an assessment as a development requirement.

128. Account must also be taken of any features that are afforded statutory protection including rights of way. Star Moss Site of Special Scientific Interest, an area of over 60 hectares to the north of site SOM 001 also benefits from statutory protection. There is no indication from Scottish Natural Heritage that the proposed development would threaten the integrity of Star Moss. However, it would be necessary for any proposal to be assessed against the potential for any impact on Star Moss.

129. As explained, I have noted the standard of footpaths in the village and I have also taken account of the level of public transport services. Neither offers high quality provision but, on balance, I have concluded that these considerations are not overriding constraints to development.

130. All-in-all, I conclude that allocation SOM 001, West End Dairy, should be retained in the proposed plan.
Candidate site LDP SOM001 Plunkie Farm

131. I note that although the representation objects to the exclusion of the candidate site at Plunkie Farm, the site boundary has been amended. Kingdom Housing Association argues that the revised site boundary relates more closely to the existing built fabric of the village. I note this opinion and also the claim that the development of the site would be physically and visually contained.

132. The council has commented on the revised site and contends, in the context of the general linear form of the village, the site SOM 001, West End Dairy, allocated in the proposed plan, provides a “better settlement boundary/fit”.

133. I have described the form of Star in the discussion on site SOM 001 (see above) and I agree with the council that the proposed site at Plunkie Farm does not accord with the character of the village. Indeed, the suggestion that the site is physically and visually contained indicates that any development would assume a significant degree of separation from the village. In my opinion, the nature of the proposed development at Plunkie Farm would not result in a physical or visual integration with Star and would therefore not contribute to the placemaking concept advocated in Scottish Planning Policy.

134. Although the council has regarded both sites (site SOM 001 and the site at Plunkie Farm) to be of similar scale, the estimated capacity at Plunkie Farm is twice that estimated for site SOM 001 as contained in the proposed plan (40 compared to 20 at the West End Dairy site). It seems to me that the scale of development at Plunkie Farm would inevitably have a greater impact on the village than the proposed development at the West End Dairy site.

135. I have noted the claimed community benefits resulting from the Plunkie Farm development including the provision of twelve affordable houses and improved access and parking for the local football club. Despite these envisaged benefits, I conclude that the location of the site is not appropriate in the context of the structure and character of the village. In turn, I conclude that the land should not be allocated for development in the proposed plan.

136. In reaching this conclusion, I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the 5-year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under Issue 2b (Homes) with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that this site would nevertheless be unacceptable because the adverse impacts identified above would outweigh the benefits of addressing any shortfall.

Reporter’s recommendations:

I recommend that the following modifications be made:

1. On page 87, under reference GLE 004, Land to the south of Cadham Road, delete the final sentence of the “Status, additional development requirements, and other information -” and replace with:

   “Developer should undertake an ecological study to determine the nature and
appropriate width of a wildlife corridor along the riverside from the east to the west of
the site, also taking account of the potential for restoration and improvement of the
water environment through site design.”

2. On page 93, under reference GLE 036, A92 Route strategy improvements, add the
following paragraph to the “Status, additional development requirements, and other
information -”:

“It should be noted that Transport Scotland currently has no plans to fund or deliver
potential improvements to the A92 trunk road. Any potential improvements and/or
upgrades will require to be provided at development management stage, as a
requirement resulting from proposed development impacts with funding identified by
the developer or others. This should be discussed with Transport Scotland at the
earliest opportunity.”

3. On the Inset Map - Glenrothes, Leslie, Markinch & Coaltown of Ballen:

remove the “Safeguarded Employment Area” designation from Nether Stenton Farm
and replace with a “white land” designation. The area to be re-designated is as
illustrated on the map accompanying representation 0572.

4. On page 107, under reference KLS 002, Laurence Park North, insert the following to
“Status, additional development requirements, and other information - “:

“A flood risk assessment should be undertaken prior to development on this site.
Design of development must take account of the findings of the flood risk
assessment.”

5. On page 94, under reference LES 001, Leslie House, insert a further development
requirement as follows:

“A flood risk assessment should be undertaken prior to development on this site.
Design of development must take account of the findings of the flood risk
assessment. No built development should take place on the functional flood plan (or
within an area of known flood risk). This requirement will apply to any future
applications for planning permission”

6. On page 95, under reference MAR 001, Markinch South, make the following
amendments:

under “Area (ha)” replace “24.1” with “15.5” taking account of the deletion of the
northern part of the site (see modification 7 below) and the current application for
planning permission in principle;

under “Est. capacity (Housing)” replace “350” with “300”;

under “Status, additional development requirements, and other information” delete
“As part of the master plan process, in recognition …” to “… pay a commuted sum to
Fife Council for the enhancement of, and/or provision of, employment land or
buildings in the local area.”; and,

insert: “Account must be taken of ancient woodland adjacent to the boundary of the
site. It is likely that a protective strip will be required, the extent of which should be determined following a detailed survey.”

7. On the Inset Map - Glenrothes, Leslie, Markinch & Coaltown of Balgonie:

delete the northern part of site MAR 001 (north of Sappi Road, opposite the disused paper mill) and replace with “protected open space” designation.

8. On page 95, in the Markinch Settlement Plan:

insert site “MAR 003, Brunton Road” as a “Housing Opportunity Site”. The site details should be derived from those contained in the Mid Fife Local Plan, Table 1: Markinch – Local Plan Proposals and Development Requirements under reference MAR01. Green Network Priorities should be inserted as appropriate.

9. On the Inset Map - Glenrothes, Leslie, Markinch & Coaltown of Balgonie:

insert site MAR 003 in terms of modification 8 above (with orange cross-hatching to indicate a housing opportunity site). The boundary should be as shown for site MAR 01 on Inset Map 10, Glenrothes, Leslie, Markinch & Coaltown of Balgonie, in the Mid Fife Local Plan.

10. On page 144, under reference MOB 001, Balfour Place / Main Street, replace the text of the “Status, additional development requirements, and other information - as follows:

“A master plan shall be prepared to guide development, including the final number of houses proposed. A flood risk assessment is required to inform the preparation of the master plan. A particular requirement is that no development shall be within 10 metres of the woodland habitat to the east of the site (identified as an amenity buffer on the Inset Map for Milton of Balgonie).”
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<thead>
<tr>
<th>Body or person(s) submitting a representation raising the issue (including reference number):</th>
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<td>Keith Preston (11)</td>
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<td>Norma Wilson (44)</td>
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<th>Settlement Plans: Thornton</th>
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PROPOSED FIFE LOCAL DEVELOPMENT PLAN

Planning authority’s summary of the representation(s):

**THORNTON**

Thornton Issues

Keith Preston (11 & 150): Object to private garden ground being designated as open space, would like this zoning changed to housing opportunity site.

Thornton Community Council (44, 269, 270, 272, 273 & 250): Object to the proposals for Thornton as this would effectively kill Thornton as a village with its own identity and make it nothing more than a precinct of Glenrothes & Kirkcaldy. Proposals would have a significant impact on infrastructure – school capacity, medical practice capacity, sewerage and traffic. No development should be proposed in the vicinity of the waste transfer station.

Object to inclusion of site THO003. This site regularly floods due to the Lochty Burn flowing nearby. This burn gets polluted with minewater from time to time. There are now 3 turbines to the south of this site. Overhead cables and pylons run through the site. Natural boundary and habitat of many species to the north of Thornton would be destroyed.

Support non-inclusion of candidate site LDP-THO003

Support non-inclusion of candidate site LDP-THO006

Neil Ross (299), Helen Paterson (385), Stuart Campbell (1422), Margaret Colville (713), Heather Smith (727), Hazel McLure (829), Robert Nicholson (1222 & 1223), Agnes Carmichael (1287), Gail Hutchison (1288), Sarah-Jane McCrum (1289), D Bennett (1300), Linda Dale (1305), Grace McLean (1307), Karen Cunningham (1306), Karen Coull (1308), Andrew Proudfoot (1309), J Hunter (1317), Peter & Ian Curran (1312), Natalie Chapman (1315), Pauline Taylor (1316), Yvonne Grieve (1329), M Stares (1330), Mark Kilpatrick (1332), June Innes (1333), Joanne Anderson (1334), J Mellon (1335), Angela Riches (1338), Mr & Mrs Grieve (1339), Mina Paterson (1875), Fiona Russell (1550), Yvonne Page (1666), Y Marshall (1669), William Smart (1671), Tom Bullimore (1676), Nicola Martin (1688), Mr & Mrs D Hutchinson (1692), Bruce Mitchell (1705), Mary Dewar (1707), Mark McCrum (1709), M W Bell (1711), Julie McColl (1719), John Dobbie (1721), Jean Clunie (1723), Janet Reenie (1729), Gemma Michelle Allan (1742), Thomas Paterson (1940), John McLure (2126), I Rorrie (2412), M Anderson (2431), Danek Nachman (2550), Linda & Fred Evans (2647), Mr & Mrs W Corrigan (2655), Wendy MacGregor (2693), Keith & Angela Taylor (2725), Fiona Ellis (2727), James Jamieson (3091), Lee Herd (3338), Patricia Smith (3602), Douglas Hunter (3690), Catherine Bett (3863): Object to proposals for Thornton for some or all of the following reasons:

- The sites lie outwith the designated settlement boundary and are not zoned for residential development. Proposals are contrary to transport policies in Scottish Planning Policy (2010) (CD57), the Approved Fife Structure Plan 2006-2026 (2009) (CD6), Adopted Mid Fife Local Plan (2012) (CD7) and the current Fife Council Transportation Development Guidelines (CD48), as well as Fife Council Supplementary Designing Streets Guidance (2009) (24) and the more recent
- Proposed design of new properties is not in keeping with what is already built in the village.
- Impact on infrastructure – schools, transport infrastructure, medical care, sewerage, water supply, water pressure and local amenities.
- Potential impact on natural habitat, local wildlife, environment and waterways.
- Impact on health and safety of villagers.
- Land stability and contamination is a problem in Thornton due to mining legacy.
- Proposed sites flood.
- Development will destroy the character of the village.
- Brownfield sites should be developed before greenfield sites.
- Object to scale of development here.
- There are road safety issues on Main Street and Station Road
- Overcrowding and the fact the houses won’t be affordable.
- Proposed new housing will lead to an increase in crime and loss of views.
- Need affordable housing.
- Object to how consultation was undertaken.

NHS Fife (3858): Potential additional 900 houses in this area could have impact on local healthcare services. It would be of benefit for discussions with NHS Fife to be arranged to confirm status of local GP and other healthcare services.

Robert H Anderson (2424), M Anderson (2432): Object to the proposed Fife Council housing on Station Road due to impact on school and increased traffic on Station Road. Site is also contaminated.

Balgonie Estates Limited (2063): Object to non-inclusion of candidate site (LDP-THO003). Supporting information provided to show the effectiveness of this site and how it offers distinct advantages to allocated site THO 003 (see representation 2063).

THO 001: Auction Mart

Hazel McLure (961), Emma Varney (1227), Emma Muldoon (2674), Michael Muldoon (2898): Object to allocation THO001 on some or all of the following grounds:

- The proposals will impact on Road Safety, Land stability, High water table, and water pressure
- Proposed design of new properties are not in keeping with what is already built in the village.
- There will also be an impact on the health and wellbeing of local residents.

THO 003: Land north and west of Thornton

Patricia Smith (42), Norma Wilson (43 & 268), Lisa Waugh (122), Eric Gibson (233),
Anne and Ian Howatson (339), Helen Paterson (610), James Wright (717), Catriona & John Scott (667), Ronald Paterson (723), Robert Lindsay (1304), Henry Hutton (1507), Emma Varney (1231), Stephen West (1310), Steven Clark (1385), George Buchanan (1457), Jamie Namyslo (1633), Hazel McLure (2151), Lynn Reid (1920), Irene Reekie (2196), Andrew Forrester (2237), John McLure (2154), John M Richardson (2344), James Jamieson (3097), Berenice Gallrush (3860), Douglas Hunter (3751), Robert H Anderson (2423): Object to inclusion of site THO003 on the following grounds:

- Development here will erode the countryside around the village and destroy natural habitat for a number of species.
- The character of the village will be destroyed.
- Existing infrastructure won’t cope - sewerage, water, water pressure, schools and doctors.
- Increase in traffic leading to road safety issues and pollution.
- This site regularly floods due to the Lochty Burn flowing nearby. This burn gets polluted with minewater from time to time.
- There are now 3 turbines to the south of this site.
- Overhead cables and pylons run through the site.
- Natural boundary to the north of Thornton would be destroyed.
- Development here will result in loss of their view of the countryside.
- Why develop greenfield site over brownfield sites in the area.
- Traffic through the village this already causes concern.
- Lack of facilities in the village.
- Views from surrounding properties will be lost.
- Proposed site includes farmhouses and access roads that are in private ownership.
- No commitment to provide a new school.
- Land stability and contamination is a problem in Thornton due to mining legacy.
- No mention of affordable housing within this development.
- Site is on prime agricultural land.

Taylor Wimpey UK Ltd (1990): Support allocation of this site. Site is effective for the purposes of inclusion within the LDP and the Housing Land Audit. A joint development framework has been prepared showing how this site will be brought forward.

Barratt East Scotland (1340 & 1341): Support allocation of this site. Supporting information provided to show that this site effective and in the hands of a housebuilder and how this site will be taken forward by a development framework addressing issues such as design, layout integration, access, etc. Request flexibility with the western boundary to provide a better design solution for this site.

SEPA (3647): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken and for a buffer strip along the watercourse and also support the inclusion of the requirement to consider through a feasibility study, the potential for restoration and improvement of the water environment through the site.

Already enough housing being built in in this area of Thornton.

Station Road is already congested and unsafe.

This area of Thornton should remain rural.

Drainage, sewerage and flooding issues.

Development here would destroy quality of life for people who want to live in the countryside. Development here will affect house prices.

School and doctors surgery would not be able to cope with the influx of people.

This site floods.

Thornton is being encompassed by Glenrothes.

Contaminated land issue.

Noise.

The village will lose its identity.

Land stability, High water table, Water Pressure issues and

Proposed design of new properties are not in keeping with what is already built in the village.

Object to inclusion of this site as it will have a detrimental impact on the sale of plots on site THO001.

There will also be an impact on the health and wellbeing of local residents.
• The proposals will impact on Road Safety, flooding, drainage local amenities, Land stability, High Water Table and Water Pressure
• Proposed design of new properties are not in keeping with what is already built in the village.

THO 009: Riverside

SEPA (3648): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site.

COUNTRYSIDE AREA

Countryside Issues

Fife Regeneration Limited (1206): object to the non-inclusion of the former opencast site at Balbeggie (candidate site ref LDP-LWD015, LDP-LWD016 & LDP-LWD017), Thornton, for mixed development including renewable energy activities, commercial uses (such as hotel, leisure and residential) on the basis that: it is an effective and well located site; there is community council support in principle for the proposal in recognition of potential job opportunities; development of the site would deal with flooding issues arising from the restoration of the opencast site; planning gain for improving infrastructure on the A92, the Redhouse Roundabout and at Thornton Station would arise from the site’s development; and the site is well-located and compliant in terms of FIFEplan Policy 11 Low Carbon Fife, and therefore suitable for the siting of wind energy, solar arrays and district heating initiatives in line with national policy.

Modifications sought by those submitting representations:

THORNTON

Thornton Issues

Keith Preston (11 & 150): Remove protected open space zoning from site to the south of Thornton and re-designate as a housing opportunity site.

Thornton Community Council (44, 269, 270, 272, 273 & 250), Neil Ross (299), Helen Paterson (385), Stuart Campbell (1422), Margaret Colville (713), Heather Smith (727), Hazel McLure (829), Robert Nicholson (1222 & 1223), Agnes Carmichael (1287), Gail Hutchison (1288), Sarah-Jane McCrum (1289), D Bennett (1300), Linda Dale (1305), Grace McLean (1307), Karen Cunningham (1306), Karen Coull (1308), Andrew Proudfoot (1309), J Hunter (1317), Peter & Ian Curran (1312), Natalie Chapman (1315), Pauline Taylor (1316), Yvonne Grieve (1329), M Stares (1330), Mark Kilpatrick (1332), June Innes (1333), Joanne Anderson (1334), J Mellon (1335), Angela Riches (1338), Mr & Mrs Grieve (1339), Mina Paterson (1875), Fiona Russell (1550), Yvonne Page (1666), Y Marshall (1669), William Smart (1671), Tom Bullimore (1676), Nicola Martin (1688), Mr & Mrs D Hutchinson (1692), Bruce Mitchell (1705), Mary Dewar (1707), Mark McCrum (1709), M W Bell (1711), Julie McColl (1719), John Dobbie (1721), Jean Clunie (1723), Janet Reenie (1729), Gemma Michelle Allan (1742), Thomas Paterson (1940), John McLure (2126), I Rorrie (2412), M Anderson (2431), Danek Nachman (2550), Linda & Fred Evans (2647), Mr & Mrs W Corrigan (2655), Wendy MacGregor (2693), Keith & Angela Taylor (2725), Fiona Ellis (2727), James Jamieson (3091), Lee Herd (3338),
Patricia Smith (3602), Douglas Hunter (3690), Catherine Bett (3863): Delete all new housing sites in Thornton.

Robert H Anderson (2424), M Anderson (2432) and NHS Fife (3858): none stated.

Balgonie Estates Limited (2063): Allocate site.

THO 001: Auction Mart

Hazel McLure (961), Emma Varney (1227), Emma Muldoon (2674), Michael Muldoon (2898): Delete site THO 001

THO 003: Land north and west of Thornton

Patricia Smith (42), Norma Wilson (43 & 268), Lisa Waugh (122), Eric Gibson (233), Anne and Ian Howatson (339), Helen Paterson (610), James Wright (717), Catriona & John Scott (667), Ronald Paterson (723), Robert Lindsay (1304), Henry Hutton (1507), Emma Varney (1231), Stephen West (1310), Steven Clark (1385), George Buchanan (1457), Jamie Namyslo (1633), Hazel McLure (2151), Lynn Reid (1920), Irene Reekie (2196), Andrew Forrester (2237), John McLure (2154), John M Richardson (2344), James Jamieson (3097), Berenice Gallrush (3860), Douglas Hunter (3751), Robert H Anderson (2423): Delete site THO 003.

Taylor Wimpey UK Ltd (1990), Barratt East Scotland (1340 & 1341), SEPA (3647): none stated.

THO 004: Spittal Farm, Elmbank Terrace/Station Road

Stuart Campbell (20, 111 & 1420), Daryn Peters (105, 106 & 618), Lorraine Kane (182), Stuart Worling (183), Jennifer Hilary Moore (188), Norma Wilson (271), Thomas McAllister (867), John M Todd (1150), Emma Varney (1228), Paul Russell (1516), Fiona Russell (1547), Christina Drummond (1508), Una Walker (1567), Ann Baxter (1576), Samantha McAllister (1607 & 1608), Hazel McLure (2147), John McLure (2133), Emma Muldoon (2676), Michael Muldoon (2900), James Jamieson (3100): Delete site THO 004.

THO 006: Network Rail Land to the east of Thornton

Daryn Peters (619), Emma Varney (1229), Hazel McLure (2150), John McLure (2137), Emma Muldoon (2677), Michael Muldoon (2901): Delete site THO 006.

COUNTRYSIDE AREA

Countryside Issues

Fife Regeneration Limited (1206): Allocate site for mixed development including renewable energy activities, commercial uses (such as hotel, leisure and residential).
Summary of responses (including reasons) by planning authority:

THORNTON

Thornton Issues

Keith Preston (11 & 150): Whilst it would be inappropriate to designate the land in question as a housing opportunity site, Fife Council does consider that there is merit in removing the open space designation from the objector’s site, leaving unallocated land within the settlement boundary for which development proposals can be tested by planning application. The Reporter is invited to make an appropriate recommendation on this matter.

Thornton Community Council (44, 269, 270, 272, 273 & 250), Neil Ross (299), Helen Paterson (385), Stuart Campbell (1422), Margaret Colville (713), Heather Smith (727), Hazel McLure (829), Robert Nicholson (1222 & 1223), Agnes Carmichael (1287), Gail Hutchison (1288), Sarah-Jane McCrum (1289), D Bennett (1300), Linda Dale (1305), Grace McLean (1307), Karen Cunningham (1306), Karen Coull (1308), Andrew Proudfoot (1309), J Hunter (1317), Peter & Ian Curran (1312), Natalie Chapman (1315), Pauline Taylor (1316), Yvonne Grieve (1329), M Stares (1330), Mark Kilpatrick (1332), June Innes (1333), Joanne Anderson (1334), J Mellon (1335), Angela Riches (1338), Mr & Mrs Grieve (1339), Mina Paterson (1875), Fiona Russell (1550), Yvonne Page (1666), Y Marshall (1669), William Smart (1671), Tom Bullimore (1676), Nicola Martin (1688), Mr & Mrs D Hutchinson (1692), Bruce Mitchell (1705), Mary Dewar (1707), Mark McCrum (1709), M W Bell (1711), Julie McColl (1719), John Dobbie (1721), Jean Clunie (1723), Janet Reenie (1729), Gemma Michelle Allan (1742), Thomas Paterson (1940), John McLure (2126), I Rorrie (2412), M Anderson (2431), Danek Nachman (2550), Linda & Fred Evans (2647), Mr & Mrs W Corrigan (2655), Wendy MacGregor (2693), Keith & Angela Taylor (2725), Fiona Ellis (2727), James Jamieson (3091), Lee Herd (3338), Patricia Smith (3602), Douglas Hunter (3690), Catherine Bett (3863), Robert H Anderson (2424), M Anderson (2432), NHS Fife (3858): Fife Council has a statutory duty to ensure that the FIFEplan Local Development Plan (LDP) (CD5) conforms to the SESplan Strategic Development Plan (CD2) before it can be adopted. The Council must maintain at least a 5 year effective housing land supply in the Kirkcaldy, Glenrothes & Central Fife Housing Market Area, and the Local Development Plan should identify sufficient sites to meet the housing land requirement for 10 years as detailed in the SESplan Strategic Development Plan (CD2). Allocating a generous supply of land for housing across the Housing Market Areas in the Local Development Plan gives the flexibility necessary for the continued delivery of new housing should unpredictable changes to the effective housing land supply occur during the lifetime of the Local Development Plan. Thornton is a settlement within the Strategic Development Area of a scale which is capable of accommodating strategic scale development or medium scale development.

Where possible, when identifying locations for new housing and other uses, Fife Council considers the re-use of previously developed land before development on greenfield sites, in line with Scottish Planning Policy (CD1). In order to conform to the SESplan Strategic Development Plan (CD2) requirements, however, it has been necessary to include greenfield development sites in the Local Development Plan. In practice, the provision of a mix of brownfield and greenfield sites is required across any Local Development Plan area to provide sufficient choice for the market to deliver the developments an area needs.
Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision. Detailed matters, such as the specifications of road access and drainage arrangements, and any contaminated land issues, will be dealt with at planning application stage. Thornton also lies within a Coal Authority risk assessment area which means the risk of mining legacy issues affecting any development proposals will be assessed as part of any planning application. Issues relating to the amenity of existing residents such as noise, nuisance, smell, privacy, daylight etc. would also be addressed at the detailed planning application stage.

In line with Fife Council policy (CD47), 15% of any new housing delivered on new sites of 10 houses or more in Thornton will be affordable housing.

Crime rates are a societal issue which cannot be addressed via the Local Development Plan, whilst the maintenance of private view and property values, are not planning matters.

Comments supporting the non-inclusion of candidate sites LDP-THO003 and LDP-THO006 are noted.

Issues regarding the consultation are addressed by the statement of conformity with the participation statement (CD45).

Robert H Anderson (2424), M Anderson (2432): This site is not allocated in the proposed FIFEplan Local Development Plan and is not in Fife Council’s 2017 Affordable Housing new build programme.

Balgonie Estates Limited (2063): The site has not been allocated as its development would not comply with the strategy of the Proposed Local Development Plan as there are more effective housing sites available within the settlement. The adopted Local Plan already identifies a number of housing sites of varying sizes in the area. These have been augmented by an additional large scale effective site to the west of Thornton. It is considered that these allocations meet the requirement at the present time and provide a good range of locations and site sizes within the area.

THO 001: Auction Mart

Hazel McLure (961), Emma Varney (1227), Emma Muldoon (2674), Michael Muldoon (2898): Site THO 001 has planning permission and is currently under construction.

THO 003: Land north and west of Thornton

Patricia Smith (42), Norma Wilson (43 & 268), Lisa Waugh (122), Eric Gibson (233), Anne and Ian Howatson (339), Helen Paterson (610), James Wright (717), Catriona & John Scott (667), Ronald Paterson (723), Robert Lindsay (1304), Henry Hutton (1507), Emma Varney (1231), Stephen West (1310), Steven Clark (1385), George Buchanan (1457), Jamie Namyslo (1633), Hazel McLure (2151), Lynn Reid (1920), Irene Reekie (2196), Andrew Forrester (2237), John McLure (2154), John M Richardson (2344), James Jamieson (3097), Berenice Gallrush (3860), Douglas Hunter (3751), Robert H
Anderson (2423):

Paragraph 80 of Scottish Planning Policy (CD1) indicates that development on prime agricultural land should not be permitted unless it is an essential component of the settlement strategy or is necessary to meet an established need, for example for major infrastructure development, where no other suitable site is available. In forming the settlement strategy for FIFEplan, whilst it is inevitable that some prime agricultural land will be used in allocating the land required to meet the SESplan housing requirement, Fife Council has considered (through the site assessment process) the impact of the various options on prime quality agricultural land and has sought to minimise its loss. This site forms an essential component of the Ore and Upper Leven Valley Strategic Development Area as set out in SESplan therefore this proposal complies with Scottish Planning Policy.

Fife Council believes there is merit in adding the following sentence to the development requirements for this site:

“A design-led consultation or charrette allowing full community involvement should be undertaken at the outset of this proposal”
and invites the Reporter to make an appropriate recommendation on this issue.

Fife Council’s response to the other comments made on THO003 is as given under the response to “Thornton Issues”, above.

Taylor Wimpey UK Ltd (1990) and Barratt East Scotland (1340 & 1341): Support for allocation of this site is noted. Fife Council considers that there is merit in the objector’s suggestion of amending the wording of the development requirements for site THO003, to allow some flexibility of the western boundary of the site to provide a better design solution, and invites the Reporter to make an appropriate recommendation on this issue.

SEPA (3647): Support for FIFEplan position is noted.

THO 004: Spittal Farm, Elmbank Terrace/Station Road

Stuart Campbell (20, 111 & 1420), Daryn Peters (105, 106 & 618), Lorraine Kane (182), Stuart Worling (183), Jennifer H Moore (188), Norma Wilson (271), Thomas McAllister (867), John M Todd (1150), Emma Varney (1228), Paul Russell (1516), Fiona Russell (1547), Christina Drummond (1508), Una Walker (1567), Ann Baxter (1576), Samantha McAllister (1607 & 1608), Hazel McLure (2147), John McLure (2133), Emma Muldoon (2676), Michael Muldoon (2900), James Jamieson (3100): Fife Council’s response to the comments made on THO004 is as given under the response to “Thornton Issues”, above.

THO 006: Network Rail Land to the east of Thornton

Daryn Peters (619), (1229), Hazel McLure (2150), John McLure (2137), Emma Muldoon (2677), Michael Muldoon (2901): Fife Council’s response to the comments made on THO006 is as given under the response to “Thornton Issues”, above.

THO 009: Riverside

SEPA (3648): Support for the FIFEplan position is noted.
## COUNTRYSIDE AREA

### Countryside Issues

Fife Regeneration Limited (1206): This site is not suitable for inclusion as a specific land allocation within FIFEplan as it is a countryside location and a proposed use which more appropriately falls to be considered on its merits against existing Development Plan policy.

### Reporter's conclusions:

#### Expansion of Thornton

1. Thornton lies within the scope of the Glenrothes, and Ore and Upper Leven Valleys Area Strategy. Additional housing is proposed, along with development in several other locations, to reflect the strategic context of SESplan. The proposed local development plan explains development is concentrated around the northern arc of the Fife Circle railway and in locations which have good access to local and regional services and employment opportunities.

2. Site THO 003, Land north and west of Thornton, has an estimated capacity of 900 houses, site THO 004, Spittal Farm, Elmbank Terrace, Station Road, has an estimated capacity of 73 houses and site THO 007 Orebank Terrace/Strathore Road, is an opportunity site with residential use being preferred and an estimated capacity of 294 houses. The total potential number of houses is therefore estimated to be 1,367.

3. The general thrust of the numerous representations objecting to the housing proposals is that the scale of development would destroy the village character. The size and nature of Thornton perhaps suggests the settlement is, in fact, a small town but I can understand that residents have the perception of “village” character and I do not take issue with this opinion. I also agree that the expansion of Thornton to the extent proposed would have a significant impact on character. I do not accept that the proposed growth would inevitably lead to the social problems or crime rate increases envisaged by some. There is no persuasive evidence to suggest that this would be the case. The council has not provided an indication of the intended phasing of development but clearly, the scale is such that the new houses would be constructed over a significant period of time. In turn, it could be envisaged that there would be scope for the incoming residents to be integrated within the community without too severe an impact.

4. Whilst I acknowledge the fear over adverse impact on the character of Thornton, I conclude that the houses required to fulfil the strategic planning objective are justified and, if phased over a reasonable period of time, would hopefully allow the character to adjust without overwhelming effect. I therefore accept the principle and scale of the development proposed and note particularly that site THO 007 is brownfield in character and should be regarded as a preferred site for development. THO 003 is an agricultural greenfield site, development of which is not ruled out by Scottish Planning Policy although, as explained, the re-use or redevelopment of brownfield land should be considered in the first instance. Scottish Planning Policy, in providing guidance on placemaking, also advocates using land within “or adjacent” to settlements, as in this case.
5. It is also understandable that unease has been expressed about the impact the level of proposed development would have on infrastructure and the built framework of Thornton. Traffic generation and school capacity are particular concerns. The council is aware of the infrastructure implications and explains that the proposed plan has been prepared in liaison with service providers. These include the council services for transport and education, and other organisations such as NHS Fife and Scottish Water. I note also that Policy 4, Planning Obligations, requires developer contributions if development would have an adverse impact on strategic infrastructure capacity or have an adverse community impact. Despite the fears expressed that former coal workings would inhibit development, the council recognises the location of Thornton within a Coal Authority risk assessment area.

6. Continuing discussions with the various organisations, for instance NHS Fife, would no doubt be beneficial and can take place irrespective of whether they are mentioned in the plan.

7. I am confident the council recognises the challenges faced in ensuring successful placemaking and will endeavour to co-ordinate the construction of new houses with the need to provide essential infrastructure and supporting services. On this basis, I conclude that appropriate development management could be applied to control the rate of the envisaged expansion in accordance with the availability of infrastructure. In turn, I conclude the proposed plan need not be altered in this respect.

Site THO 003

8. Representations making specific objections to site THO 003 include concern about flooding and traffic generation. In these respects, the proposed plan stipulates the need for both a transport assessment and a flood risk assessment as development requirements. Destruction of habitat is raised as an issue but there is no indication that the site has any formal nature conservation designations. No objection has been submitted by Scottish Natural Heritage which I consider to be significant.

9. Reference is also made to overhead power lines and wind turbines. I am satisfied that any development proposals would take account of these or any other constraining features. Indeed, the proposed plan requires the preparation of a development framework for the approval of the council. It is reasonable to expect the framework document would address matters such as this to demonstrate the form the development would take. Indeed, I note in this respect that Taylor Wimpey UK Limited and Barratt David Wilson Homes control the site and jointly commissioned a development framework which, as expected, assesses the site constraints and development principles.

10. As indicated above, the council has liaised with service providers in terms of infrastructure and I conclude that a co-ordinated development could be anticipated.

11. The framework document prepared by Taylor Wimpey UK Limited and Barratt David Wilson Homes suggests an enlargement of the allocated area to provide a more regular western boundary. This area is shown to be under the control of the developers and, it is suggested, would enable an improved landscape boundary to the development. The council agrees with the boundary adjustment and I see no reason not to accept this relatively small addition to the allocated area. The estimated capacity would not increase.
12. In accordance with standard planning procedure, preservation of views and property values are not matters I have taken into account in assessing the land use implications of the proposal. All-in-all, I conclude that site THO 003 should be retained in the proposed plan with an amended western boundary.

Sites THO 001 Auction Mart; THO 004 Spittal Farm, Elmbank Terrace/Station Road; THO 006 Network Rail Land to the east of Thornton

13. These three sites require to be considered individually, as a group and in the wider context of the housing land proposals for Thornton.

14. Despite the concerns expressed about site THO 001, planning permission has been granted, work has commenced and roads into the site have been constructed. Although work is not proceeding at present it is clear that a material start to the development has been made and therefore the planning permission remains extant. On this basis, the proposed plan correctly indicates the status of the site. It would be inappropriate to make a change.

15. Various detailed issues have been raised in respect of site THO 006 but, prior to any development commencing, it would be necessary to demonstrate that all constraints had been addressed. Reference has been made to asbestos, flooding and drainage, ground stability, house design and access. In this final regard, the proposed plan requires “a new appropriate T-junction”. These are all matters for consideration during the development management process at the time any detailed proposal is brought forward.

16. I have no reason to believe that Station Road could not accommodate the level of traffic generated. Service providers have been involved in the preparation of the local development plan and I have not been informed of any concerns in respect of traffic impact on either residential properties or the primary school. Enforcement of matters involving speed restrictions and traffic obstruction are the subject of other regulatory authorities.

17. All-in-all, I do not believe that the limited scope for residential development within site THO 006 is likely to cause a significant detrimental impact on residential amenity or road safety. I therefore do not consider that it is necessary to change the proposed plan in this respect.

18. Several of those submitting representations objecting to site THO 004 refer to having been informed the land would never be developed and complain about loss of view. I note that this site is not included within the settlement boundary in the current local plan. Nevertheless, the local development plan review provides the opportunity for the council to assess land use designations in the light of need, for instance, for housing or employment land. This process can lead to development allocations on land that has not previously been considered for development. The procedure is subject to consultation and publicity and also includes provision for the current examination. Loss of a view is not usually a matter for control through the planning process although impact of development on established residential amenity is a valid concern.

19. As explained above, the council has pointed to the need to conform to the strategic requirements of SESplan. The wider housing land context is discussed under Issue 2(b) and I accept the level of housing land to be allocated has inevitably led to the proposed
allocation of some greenfield sites. Site THO 004 is one such site.

20. The existing development at the eastern end of Station Road extends along the frontage to both the north and south sides of the road. There is a mixture of traditional and modern houses. These houses are detached from the rest of Thornton, an effect that is exacerbated by the intervening line of the A92 which is on an embankment at this point. Nevertheless, I accept that this section of Station Road is essentially part of Thornton.

21. Sites THO 006 and, particularly, THO 001, which I have considered above, will change the linear form of development by extending housing to the south. Indeed, site THO 001, which has been granted planning permission, already has site access roads. The development of site THO 004 would reflect the principle of providing an area of development to the south of Station Road. On balance, therefore, I accept that this location provides the opportunity to contribute to the strategic housing allocation.

22. I have noted the specific concerns raised, including road safety, ground stability, flooding, water supply and design, which are perceived as constraints to the development of site THO 004. The council is aware of the issues and has explained that the proposed plan has been prepared in liaison with service providers. There has been no indication that there would be an insurmountable problem to inhibit the development of the site.

23. I have been provided with no information to support the contention that the site is liable to flood or that ground conditions are unsuited to building. However, I have no doubt that when detailed proposals are brought forward it will be necessary to demonstrate a flood risk assessment has been undertaken and that ground conditions do not preclude building. Detailed layout and building design would also be assessed at that time under the development management process along with any other implications of development.

24. Overall, I conclude that the deletion from the proposed plan of site THO 004 is not justified.

Candidate site LDP-THO003 Main Street Thornton

25. Balgonie Estates Limited argues that the allocation of this site for housing and open space would be preferable to the larger development proposed to the west of the B9130. (site THO 003). The proposed site is more central, compatible with adjacent land uses, and, it is claimed, would round-off Thornton. In turn, the site would provide a more sustainable development which would be in character with the existing village structure. Furthermore, the site is effective and it would offer a range of choice and location for new houses. The council does not accept these arguments and contends that the potential range and choice of sites proposed would be preferable.

26. In a wider context, I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the 5-year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under Issue 2(b) Homes with regard to the level of this shortfall. Regardless of the level of shortfall identified, local considerations are also important and I find that this site would nevertheless be unacceptable because the adverse impacts identified below would outweigh the benefits of addressing any shortfall.
27. Insofar as local considerations are concerned, I can see some merit in aspects of the arguments put forward in the support of the allocation of candidate site LPD-THO003, especially in terms of its relationship with the existing built up area of Thornton. However, with a suggested capacity of a minimum of 150 houses, the contribution would be very far short of the proposed allocation to the west of the B9130 if the candidate site were to be included in the proposed plan as an alternative. Should the site be an additional allocation, it would provide the potential for further house construction close to the heart of the settlement. I consider that this could well be an overwhelming prospect should the development to the west be proceeding simultaneously.

28. The development of the candidate site would also threaten the integrity of Thornton as it would bring more houses significantly closer to new development in Glenrothes on the opposite, northern bank of the Lochty Burn. The development boundary of site THO 003 to the west of the B9130 is also the Lochty Burn but, to the north, is a wide swathe of protected open space. The open space opposite the candidate site is significantly less substantial and I believe the visual impact would not be acceptable in terms of maintaining separation between Thornton and Glenrothes.

29. On balance, I conclude that candidate site LPD-THO003 should not be allocated for residential development in the proposed plan.

Land at 5 Riverside

30. I agree the private garden land at this residential address should not be allocated as “protected open space”. On the other hand, the land should not be designated as a “housing opportunity site”. As Mr Preston explains, the garden grounds are part of his private dwelling. As such, a development allocation would not be appropriate. The land should therefore be allocated as “white land” within the settlement boundary. Development requiring planning permission should be dealt with through the development management process under relevant development plan policies. In this respect I have noted an advertisement on the site which relates to the sale of a house plot.

COUNTRYSIDE AREA

Candidate sites LDP-LWD015, LWD016 & LWD017

31. The three sites lie in the countryside to the south of Thornton, the southern settlement boundary being clearly defined by the River Ore to the west of the B9130.

32. Although Site LDP-LWD015 is partially adjacent to the settlement boundary, the intervening river provides a distinct sense of separation. The land has no significant visual or physical relationship with Thornton. In turn, proposed development of the site would not comply with the principles set out in Scottish Planning Policy in respect of placemaking.

33. It has been suggested that the land is brownfield in nature, being a former opencast mining site. Accordingly, it is argued, the site should be preferred as a location for development. I agree that Scottish Planning Policy certainly requires the consideration of brownfield land before new development takes place on greenfield sites. However, I do not believe this suggests that development should be supported on all brownfield sites. Clearly, the nature of the proposed development and the location of the site are
also important. In this latter respect, I note that the glossary definition of brownfield land in Scottish Planning Policy refers to land “within the settlement boundary”. In general terms, land in countryside locations, albeit brownfield in character, cannot necessarily anticipate that development would be supported.

34. In any event, site LDP-LWD015, the former Balbeggie opencast site, is the subject of a restoration plan. As is the case with many similar sites, restoration work often returns the site to a condition suitable for a countryside location in terms of appearance and use. In other words, the brownfield character and status of the site is removed and, as a consequence, any development preference is reduced or, more probably, removed.

35. Overall, I agree with the council that allocations for the suggested uses – housing, commercial or energy/renewables schemes would not be appropriate. Specific proposals should be brought forward and assessed against the relevant policies of the development plan.

36. Sites LDP-LWD016 and LDP-LWD017 are even further from Thornton and have no direct relationship with the settlement. Commercial allocations are sought but the countryside location points firmly against the encouragement of sporadic development of this nature. Again, should it be intended to pursue any particular development proposal, this should be brought forward for assessment against policy.

37. On the basis of the above there is no justification to modify the proposed plan in terms of these three sites.

38. In reaching this conclusion, I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the 5-year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under Issue 2b (Homes) with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that these sites would nevertheless be unacceptable because the adverse impacts identified above would outweigh the benefits of addressing any shortfall.

**Reporter’s recommendations:**

I recommend that the following modifications be made:

1. On the inset map for Thornton:

   amend western boundary of site THO 003, Land north and west of Thornton, as shown in the Taylor Wimpey UK Limited and Barratt David Wilson Homes submission, Appendix A – Development Framework, at page 8, Indicative Development Framework;

2. On the inset map for Thornton:

   delete the Protected Open Space allocation from within the domestic curtilage of number 5, Riverside and replace with “white land” designation.
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<th>Issue 14</th>
<th>LEVENMOUTH AREA</th>
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<tr>
<td>Development plan reference:</td>
<td>Settlement Plans: Levenmouth area (pages 132 – 133), Buckhaven (page 128), Coaltown of Wemyss (page 45), East Wemyss (page 82), Kennoway (pages 136 – 137), Leven (pages 127 – 128), Methil and Methilhill (pages 129 – 131), West Wemyss (page 181), Windygates (page 137) Countryside Proposal LWD 029 (page 188)</td>
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<tr>
<td>Reporter:</td>
<td>Katrina Rice</td>
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<td>Body or person(s) submitting a representation raising the issue (including reference number):</td>
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<td>BUCKHAVEN</td>
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<tr>
<td>BKN 002 Factory Road</td>
<td>Forth Ports Ltd (1779) Scottish Enterprise (3867)</td>
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<td>NHS Fife (3854)</td>
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<td><strong>LVA 001 Levenmouth Strategic Development Area</strong></td>
<td>Diageo (Scotland) Ltd (1148)                      CLEAR (2036)                  Wemyss Estate Trustees (2094)                      Scottish Enterprise (3915)</td>
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<td>Scottish Enterprise (1068)                      CLEAR (2184)                          SEPA (3577)</td>
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<td><strong>MET 011 Methil Power Station</strong></td>
<td>Scottish Enterprise (1069)                      Forth Ports Ltd (1806)                  SEPA (3578)</td>
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<td>WWS 001 Wemyss Estate land at West Wemyss</td>
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<td>Wemyss Estate Trustees (2128)                      The Woodland Trust Scotland (2919)                  Diarmuid O'Connor (SEPA) (3652)</td>
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<td>Windygates Issues</td>
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<td><strong>COUNTRYSIDE AREA</strong></td>
<td>LWD 029 Silverburn Park, Leven</td>
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<td>SEPA (3570)</td>
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Provision of the development plan to which the issue relates:

Settlement Plans: Buckhaven, Coaltown of Wemyss, East Wemyss, Kennoway, Leven, Levenmouth area, Methil and Methilhill, West Wemyss, Windygates, Countryside Proposal LWD 029

Planning authority’s summary of the representation(s):

**LEVENMOUTH AREA**

Levenmouth area issues

NHS Fife (3854): Housing allocations in the Levenmouth area will impact on healthcare services, further discussions with NHS Fife are advised.

Proposal LVA 001 Levenmouth Strategic Development Area

Diageo (Scotland) Ltd (1148): Do not object to this proposal or any of the uses proposed but have concerns over the proximity of the housing element of Proposal LVA 001 to their Distillery operations. The operations create noise and odour likely to impact on the amenity of any nearby housing. Suggest that the housing is located to the south and west of the site with employment uses to the north; and that the green network at the junction of the A915 and B932 is extended south within the Strategic Development Area to provide further separation and help mitigate the noise and odour issues.

Wemyss Estate Trustees (2094): Support Proposal LVA 001. Wemyss Estates Trustees remain committed to delivery of the Strategic Development Area (SDA) and will work to bring forward proposals for the site in 2015. The Levenmouth SDA can deliver a significant number of new homes close to key employers, and it is appropriate that Fife Council should carry this existing allocation across to the LDP. Some key developments within the SDA have already advanced in particular the new secondary school and employment land assembly.

The representation from Diageo (Scotland) Ltd (1148, above) is noted. The spatial plan developed in the Strategic Framework Document 2012 is only a concept for the site; detailed consideration of the exact location of housing on the site will be considered through pre-application discussions with key stakeholders. Any resulting reconfiguration of the site can be reflected in an updated masterplan and planning application. As the Strategic Framework Document 2012 was prepared with the Council there should be no requirement to change the current broad land-use zoning in the absence of further or updated detailed commentary from the relevant regulatory bodies. The Action Programme has the wrong capacity identified for the site.

CLEAR (2036): Support Proposal LVA 001. It is important that the housing provided includes aspirational housing as well as affordable to improve the housing mix in the area. There is a concern that the badly needed road network improvements may impact on the greenspace at Starkies Wood or the common good park adjoining the High School, the road must be carefully sited so that valuable greenspaces are not lost.

Scottish Enterprise (3915): Support the Levenmouth Strategic Development Area. The coordinated development of this area will provide the required housing, employment and associated facilities necessary to meet development needs within Levenmouth. The benefits and necessity of the Leven Link Road project (proposal LVA002) should be
referred to within the policy section on Levenmouth Strategic Development Area.

Proposal LVA 002 Levenmouth Link Road

Forth Ports Ltd (1779): The indicative route of Proposal LVA 002 is through operational port land within Forth Ports Ltd ownership. Forth Ports Ltd has not been consulted about this proposal and have no plans to release land for alternative uses during the plan period. Therefore the route of this proposal should be revised so that it is outwith the operational Port of Methil.

Scottish Enterprise (3867): Support the Leven Link Road project (Proposal LVA002) and consider it should be referenced in all the employment sites in the Methil Docks area and the Fife Energy Park (proposal MET 010). The proposal should be more clearly indicated on the maps and greater emphasis should be paid, in the LDP and Supplementary Guidance on Planning Obligations, towards delivery of the proposal.

BUCKHAVEN

Proposal BKN 002 Factory Road

CLEAR (2180): Support proposal BKN 002 changing its designation to an employment site as long as the field to the north is also designated as employment land; would not support the change if the field to the north was to be designated as housing. The path linking the Fife Coastal Path, at Viewforth steps, to the top of Victoria Road and Station Road/Place should be protected as a right of way.

COALTOWN OF WEMYSS

Proposal CLW 002 Land South of Coaltown of Wemyss

Wemyss Estate Trustees (2117): Support proposal CLW 002 which has been granted planning permission and forms part of the effective housing land supply.

The Woodland Trust Scotland (2873): Proposal CLW 002 is adjacent to an area of ancient woodland. Object to development on this site as it would lead to loss or damage to ancient woodland and recommend that the site is not allocated unless the protection of the adjacent woodland can be guaranteed. If the site is to be identified for development a 10m buffer between the proposed development and woodland should be identified as a development requirement. Recommend that appropriate survey work is carried out if protected species are present on site or adjacent to the site.

EAST WEMYSS

Proposal EWS 001 West of Randolph Street

Lindis Cunningham (1526): Object to Proposal EWS 001, there are enough new homes being built in Kirkcaldy. Development would lead to loss of farmland and would adversely impact on wildlife in the area.

Wemyss Estate Trustees (2121): Support the designation of Proposal EWS 001 as a housing opportunity site. The site forms part of a wider masterplan and benefits from an extant planning permission for residential development.
SEPA (3400): Support the requirement for a Flood Risk Assessment (FRA) to be undertaken prior to development on the site.

KENNOWAY

Kennoway Issues

Kennoway Community Council (856): Generally support the proposals for Kennoway, but question if the village can support 400 more houses. Priority should be given to affordable housing. Development would need to be supported by infrastructure improvements (roads, education, health services and employment opportunities).

Agnes Adams (27): The traffic created by the 90 houses proposed on sites KEN 003 (Langside Crescent, South), KEN 004 (Langside Crescent) and KEN006 (Kennoway School) will cause major problems along the small access road. There is already congestion during school terms and this will be an additional hazard to drives and pedestrians (disruption and congestion will also be an issue during the construction period). Question if the local services have the capacity to cope with this increase in the village.

Proposal KEN 002  Land between Halfields Gardens and Leven Road

Miss King (13, 950): Object to the allocation of proposal KEN 002. Development would result in: loss of views; reduction in property values; and additional traffic, noise and dirt. What is the justification for more private houses in the current economic conditions (Fife Council budget cuts, redundancies in the big firms in Levenmouth)? Want assurance that there will be no disruption when these houses are being built, such as noise at the weekends and loss of gas/electricity and water supply.

The Woodland Trust Scotland (2897): Proposal KEN 002 is adjacent to an area of ancient woodland. Object to development on this site as it would lead to loss or damage to ancient woodland and recommend that the site is not allocated unless the protection of the adjacent woodland can be guaranteed. If the site is to be identified for development a 10m buffer between the proposed development and woodland should be identified as a development requirement. Recommend that appropriate survey work is carried out if protected species are present on site or adjacent to the site.

John Bissett (1473): Object to the allocation of proposal KEN 002. The site is unsuitable for housing due to the topography; any development would require a lot of earth moving and there are drainage issues. Development would also have an adverse impact on wildlife in the area and on the amenity of adjacent houses (noise). Fife Council has twice refused permission for development on this land.

Sandy Simpson (3720): The allocation of proposal KEN 002 is supported. The site would contribute towards the effective housing land supply requirements and is available in the short term. Agree with the need for a development framework to be developed that addresses the sensitive landscaping and edge of settlement issues. Initial approaches have been made to the adjacent landowners to work collaboratively on delivering the framework.

SEPA (3530): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site and the requirement for a buffer strip along the
watercourse to help protect and improve the water environment.

Proposal KEN 003 Langside Crescent, South

Kenneth Greer (104): Object to the allocation of proposal KEN 003. The site is surrounded by housing and has inadequate access. Development would result in: additional traffic close to the primary school increasing the potential for accidents; increase the risk of over capacity at the primary school; adverse impacts on the amenity of the surrounding houses (noise, light pollution, loss of privacy); adverse impacts on wildlife and trees; and capacity issues at the doctors surgery which already struggling to cope.

Janice Smith (17): Object to the allocation of proposal KEN 003. Development would result in increased traffic along a route to the primary school; loss of parking, loss of privacy and depreciation in property values for adjacent properties.

Harry Marshall (126): Object to the allocation of proposal KEN 003. Too many houses are proposed on the site. Development would result in increased traffic along a route to the primary school; loss of privacy and depreciation in property values for adjacent properties.

Agnes Adams (3908): Proposal KEN 003 was designated as open space by Fife Council as part of the planning agreement to build housing to the north of the path linking Langside & the Cupar Road.

Proposal KEN004 Langside Crescent

Agnes Adams (3886): The capacity of Proposal KEN 004 is given as 25 but it only has permission for 5 houses.

Sites (not included in the Proposed FIFEplan) proposed by Objectors

Jim Howie (1974): Object to the non-allocation of land at Crossroads Field (Candidate site LDP-KEN001 (Land at Crossroads Field) - see Supporting Document SD1). The site is effective and of a scale that is consistent with the organic growth of Kennoway. The scale of the proposed development has been reduced in response to previous comments from Fife Council and the various issues raised in the site assessments can be addressed.

Disagree with the site assessment conclusion that there are more suitable sites available in Kennoway. Only one additional site has been allocated in Kennoway (KEN 002) which has a number of development constraints to be addressed in addition previous planning applications for part of site KEN002 have been refused as contrary to policy, flood risk issues and road safety. It is considered that the deliverability and effectiveness of this site have not been adequately demonstrated and therefore the site does not merit the allocation of the site contrary to the strategy of the FIFEPlan. Dispute that this site is more suitable for development than the land at Crossroads Field.
**LEVEN**

**Leven Issues**

Eleanor Todd (118): Leven needs high quality housing; land along Largo Road, Leven would be a suitable location with uninterrupted views over the golf course and the sea.

**Proposal LEV 001 Leven Vale South & Proposal LEV 002 Leven Vale West**

Persimmon Homes (East Scotland) (1981 & 1982) are unclear if the 75 capacity shown for proposal LEV 001, and the 200 capacity shown for proposal LEV 002, represent the remaining capacities or the totals for the site. Need this clarity to determine the impact on the LDP Housing Supply.

**Proposal LEV 003 Land at Cupar Road**

Deborah Vanstone (730): Object to Proposal LEV 003. Development on this site would increase traffic on an already busy and dangerous road. This would impact on the health of current Cupar Road residents through increased traffic noise and be dangerous for exiting drives and pedestrians crossing the road.

I & A Clark (1885): Support the continued allocation of Proposal LEV 003 for housing development. This is an effective housing site with market interest which is expected to deliver housing during the lifetime of the plan. The owners of the land are in advanced discussions with a housebuilder who expect to make a planning application in 2015.

**Proposal LEV 005 Thornton and Leven to Westfield rail lines & LEV 008 Bawbee Bridge**

Transport Scotland (3217 & 3222): Agreement has not been reached with Transport Scotland on the inclusion of proposals LEV 005 and LEV 008 within the Proposed Plan.

In relation to LEV 005, the identification of transport interventions should result from the assessment of evidence based transport problems and opportunities of a specific area. Transport Scotland understands that Fife Council is currently undertaking a refresh of the 2008 STAG appraisal which they hope to have completed by spring 2015. A business case will also be required to determine the financial viability and deliverability of the rail lines for the re-introduction of passenger and/or freight services, and the impact this would have on the wider railway network.

As regards LEV 008, any station on this line is dependent on the re-opening of the Leven - Thornton rail link. This proposal was not included within the Strategic Transport Projects Review and has no commitment by Transport Scotland to either fund or deliver the re-opening of this line. Any proposal to re-open the line is in the very early stages of appraisal, therefore there is a considerable amount of assessment to be undertaken to establish the merits, or otherwise, of re-opening the rail link and how it would be funded and delivered prior to the consideration of any additional stations. Consequently, it is recommended proposal LEV 008 should be removed from the Proposed Plan.

Scottish Enterprise (3868): Supports the reintroduction of the Thornton to Leven rail link (Proposal LEV 005), and the proposal should be more clearly indicated on the maps and greater emphasis should be paid, in the LDP and Supplementary Guidance on Planning Obligations, towards delivery of the proposal.
SEPA (3550): Support the requirement in proposal LEV 008 for a Flood Risk Assessment to be undertaken.

Proposal LEV 006 Former Gasworks Site

SEPA (3549): Support the requirement in proposal LEV 008 for a Flood Risk Assessment to be undertaken.

Sites (not included in the Proposed FIFEplan) proposed by Objectors

Muir Homes Ltd (894): There are significant issues with the land supply in the Kirkcaldy, Glenrothes and Central Fife Housing Market Area. The area contains a number of Strategic Development Areas and other constrained sites which are not delivering the required level of development required in order to meet SESplan requirements. FIFEplan needs to be flexible in the allocation and scale of new development sites in order to support the delivery strategy.

Candidate site LDP-LEV001 Duniface Farm, Windygates Road, Leven (see Supporting Document SD2) is an effective site which requires no deficit funding. The site forms the next phase of a successful development where the main infrastructure is already in place (access roundabout, SUDs pond, education capacity, water/drainage connections, etc.) and which has delivered housing over a number of years. The physical and environmental issues relating to the development of this site can all be successfully addressed. The proposal is for 150 houses (including affordable homes) with significant areas of public open space (including sports and play facilities, landscaping and allotments) and a site identified for a shop. The indicative masterplan takes on board comments previously made by the local Community Council. The proposal is considered to represent an appropriate form of sustainable development.

METHIL & METHILHILL

Methil and Methilhill Issues

Forth Ports Ltd (1762): Support the designation of the operational Port of Methil as a safeguarded employment area; this reflects its industrialised nature. The green network opportunities identified within the operational port are should be deleted as Forth Ports does not intend to release land for alternative uses during the plan period, these would not be implementable and could interrupt the operation of the port and contravene bye-laws put in place to protect the health, safety and security of both operators and members of the public. The indicative route of the Levenmouth Link Road should also be moved outwith the land used for the operational port. The boundary of the safeguarded employment land designation needs to be amended to correctly reflect the boundary of the operational land of the Port of Methil.

Proposal MET 004 Glencast Foundry

SEPA (3574): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site.
Proposed Fife Local Development Plan

Scottish Enterprise (1063, 1064, 1065, 1066, 1067 & 1068): Support the designation of Proposals MET 005, MET 006, MET 007, MET 008, MET 009 and MET 010 for employment, they should be considered as strategic employment sites. The necessity of the Leven Link Road project (Proposal LVA 002) and its benefits should be referenced in the development requirements which should also make clear that light and general industrial uses are appropriate.

SEPA (3575, 3576, 3577): Support the requirement in Proposals MET 005, MET 006 and MET 010 for Flood Risk Assessments to be undertaken prior to development on the sites.

SEPA (3569): Proposal MET 008 is located in or adjacent to the functional flood plain or an area of known flood risk. A Flood Risk Assessment is required to ensure that the development does not increase flood risk on site or elsewhere and that any development is free from flood risk using appropriate mitigation measures.

CLEAR (2184): Question why the Energy Park Fife (Proposal MET 010) is shown under Methil when it falls within the geographical area of Buckhaven.

Proposal MET 011 Methil Power Station

Forth Ports Ltd (1806): Support the designation of this site as a development opportunity but the preferred uses identified are overly restrictive and do not reflect information provided by Forth Ports regarding their intention to retain the Port estate in operational port use. The designation should reflect the industrialised nature of the operational port land and be identified as for employment led mixed use, including residential development.

Forth Ports consider that the requirement for a design framework, drawing from the Bawbee Bridge design led consultation Charrette 2013 is inappropriate for a number of reasons: the design framework could constrain the form of future development, the issues could be adequately addressed by a masterplan supporting an application; the findings of the charrette do not take into account Forth Ports intentions for the site; and the charrette findings are not Supplementary Guidance and do not provide clear guidance for the site.

A green network opportunity crosses the site, as this land forms part of an operational port it is not appropriate to propose a route across it as this would contravene bye-laws put in place to protect the health, safety and security of both operators and members of the public.

The proposal requires a Flood Risk Assessment and also sets out a section of Habitats Regulations Appraisal Mitigation. This provision within the proposal text is unnecessary as these matters are either addressed by other policies of the Development Plan or by statutory requirements.

The boundary of the site should be revised to accurately reflect the extent of Forth Ports’ ownership.
SEPA (3578): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site.

Scottish Enterprise (1069): Would support employment uses on this land and consider it should be identified as a strategic employment site. The necessity of the Leven Link Road project (Proposal LVA 002) and its benefits should be referenced in the development requirements which should also make clear that light and general industrial uses are appropriate.

WEST WEMYSS

Proposal WWS 001 Wemyss Estate land at West Wemyss

The Woodland Trust Scotland (2919): Proposal WWS 001 is within an area of ancient woodland (acknowledge that Planning Permission in Principle has been granted). However, object to development on this site as it would lead to loss or damage to ancient woodland and recommend that the site is not allocated unless the protection of the adjacent woodland can be guaranteed. If the site is to be identified for development a 10m buffer between the proposed development and woodland should be identified as a development requirement. Recommend that appropriate survey work is carried out if protected species are present on site or adjacent to the site.

Wemyss Estate Trustees (2128): Support the designation of Proposal WWS 001 as a housing opportunity site. The site was granted planning permission in principle in June 2010.

SEPA (3652): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site.

WINDYGATES

Proposal WDY 001 Balcurvie Meadows

Persimmon Homes (East Scotland) (1984): It is unclear if the 55 capacity shown for proposal WDY 001 is the remaining capacity or the total for the site. Need this clarity to determine the impact on the LDP Housing Supply.

Proposal WDY 003 Cameron Bridge

SEPA (3650): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site.

Sites (not in the Proposed FIFEplan LDP) proposed by Objectors

The William Brown Trust (3893): Object to the non-allocation of candidate site LDP-WDY 001 (Durievale, Leven Road) as a housing site (see Supporting Document SD3). A land supply shortfall presently exists within Fife, there is an over reliance on the Levenmouth Strategic Development Area, which has no named developer interest therefore additional sites should be allocated to augment the housing land supply. It is considered that candidate site LDP-WDY 001 should be included as an allocated housing opportunity supported by Policy 2.
The site compares favourably against the provisions of Policy 1 and can address policies 10 -14, an indicative development framework is provided to demonstrate this. The site was considered as a ‘reasonable alternative’ within Windygates suggesting that this represents the most logical direction of growth for the settlement. The site can be designed to integrate with Windygates and provide an effective, deliverable housing site.

Issues of flood risk and education capacity have previously been raised through the planning process. The appeal decision on outline planning application 07/02454/COPP concluded that ‘flood risk is not an insurmountable obstacle to development’. Education capacity remains an issue that will require to be addressed for all new housing sites and is therefore not considered a sufficient reason for exclusion of the site at this stage. It is considered that the reason for refusal in 2008/09 was primarily policy principle-based, this policy position has now changed, the site can overcome other issues and be considered a viable site at this time.

Alec MacPherson (1694): Object to the non-allocation of candidate site LDP-WDY 002 Balcurvie Farm as a housing site (see Supporting Document SD4). The site is well served by public transport, lies within walking distance to local services, is effective and free of absolute constraints and suitable infrastructure exists to accommodate the development. The Council’s Site Assessment fails to consider proposed stand-off distances and landscaping areas to the north of the site which would reduce visual impact and avoid coalescence in addition access can be provided onto Kennoway Road and not solely from Fa’latch Road as the Council has asserted.

COUNTRYSIDE AREA

Proposal LWD 029 Silverburn Park, Leven

SEPA (3570): Support the requirement for a buffer strip along the watercourse to help protect and improve the water environment.

Modifications sought by those submitting representations:

LEVENMOUTH AREA

Levenmouth area issues

NHS Fife (3854): none stated.

Proposal LVA 001 Levenmouth Strategic Development Area

Diageo (Scotland) Ltd (1148): The development framework diagram should be revised to remove housing from the north of the site, to be replaced with employment uses. There should be a greater green network buffer shown to the north of the site.

Wemyss Estate Trustees (2094): There is an error on page 53 of the Action Programme, which states that the site is expected to deliver 650 houses. This should be rectified to 1,650 houses.

Scottish Enterprise (3915): Include text on the benefits and necessity of the Leven Link Road project (proposal LVA002) in the policy section on Levenmouth Strategic
Development Area.

CLEAR (2036): none stated.

Proposal LVA 002 Levenmouth Link Road
Forth Ports Ltd (1779): The route of proposal LVA 002 should be revised so that it is outwith the land covered by the operational Port of Methil.

Scottish Enterprise (3867): Proposal LVA 002 should be more clearly indicated on the maps. Provide greater emphasis in the LDP and Supplementary Guidance on Planning Obligations, towards delivery of proposal LVA 002.

BUCKHAVEN

Proposal BKN 002 Factory Road
CLEAR (2180): Protect the path linking the Fife Coastal Path at Viewforth steps to the top of Victoria Road and Station Road/Place as a right of way.

COALTOWN OF WEMYSS

Proposal CLW 002 Land South of Coaltown of Wemyss
Wemyss Estate Trustees (2117): none stated.

The Woodland Trust Scotland (2873): Delete proposal CLW 002 from the plan or identify a 10m buffer between the proposed development and the area of ancient woodland in the development requirements.

EAST WEMYSS

Proposal EWS 001 West of Randolph Street
Lindis Cunningham (1526): Delete Proposal EWS 001.

Wemyss Estate Trustees (2121) and Scottish Environment Protection Agency (3400): none stated.

KENNOWAY

Kennoway Issues
Agnes Adams (27) and Kennoway Community Council (856): none stated.

Proposal KEN 002 Land between Halffields Gardens and Leven Road
Miss King (13, 950) and John Bissett (1473): Delete proposal KEN 002.

The Woodland Trust Scotland (2897): Delete proposal KEN 002 from the plan or identify a 10m buffer between the proposed development and the area of ancient woodland in the development requirements.
Sandy Simpson (3720) and Scottish Environment Protection Agency (3530): none stated.

**Proposal KEN 003 Langside Crescent, South**

Kenneth Greer (104), Janice Smith (17), Harry Marshall (126) and Agnes Adams (3908): Delete proposal KEN 003 from the plan.

**Proposal KEN 004 Langside Crescent**

Agnes Adams (3886): The capacity of Proposal KEN 004 is given as 25 but it only has permission for 5 houses.

**Sites (not included in the Proposed FIFE plan) proposed by Objectors**


**LEVEN**

**Leven Issues**

Eleanor Todd (118): Allocate land for housing along Largo Road, Leven.

**Proposal LEV 001 Leven Vale South & Proposal LEV 002 Leven Vale West**


- Clarify if the 75 capacity indicated for proposal LEV 001 is the remaining capacity or a total for the site.
- Clarify if the 200 capacity indicated for proposal LEV 002 is the remaining capacity or a total for the site.

**Proposal LEV 003 Land at Cupar Road**

Deborah Vanstone (730): Delete Proposal LEV 003.

I & A Clark (1885): support for FIFEplan position is noted.

**Proposals LEV 005 Thornton and Leven to Westfield rail lines & LEV 008 Bawbee Bridge**

Transport Scotland (3217 & 3222): None stated regarding Proposal LEV 005, but wish to see the deletion of Proposal LEV 008.

Scottish Enterprise (3868): Proposal LEV 005 should be more clearly indicated on the maps and greater emphasis should be paid, in the LDP and Supplementary Guidance on Planning Obligations, towards delivery of the proposal.

SEPA (3550): none stated.
Proposal LEV 006 Former Gasworks Site

SEPA (3549): none stated.

Sites (not included in the Proposed FIFEplan) proposed by Objectors

Muir Homes Ltd (894): Allocate candidate site LDP-LEV001 for residential development.

METHIL & METHILHILL

Methil and Methilhill Issues

Forth Ports Ltd (1762):

- Amend the proposals map to ensure the safeguarded employment land designation reflects corrects boundary of the operational land of the Port of Methil.
- Relocate the indicative route of Levenmouth Link Road outwith the operational land of the Port of Methil (Proposal LVA 002 Levenmouth Link Road).
- Delete the Green Network opportunities within the operational Port of Methil.

Proposal MET 004 Glencast Foundry

SEPA (3574): none stated.

Proposals MET 005 (Land north of Bayview Football Stadium), MET 006 (Ajax Way), MET 007 (west of Doctors Surgery), MET 008 (West of Thompson House), MET 009 (Barclay Brothers site), MET 010 (Energy Park Fife)

Scottish Enterprise (1063, 1064, 1065, 1066, 1067 & 1068): the development requirements for Proposals MET 005, MET 006, MET 007, MET 008, MET 009 and MET 010 should reference the necessity of the Leven Link Road project (Proposal LVA 002) and its benefits, and make clear that light and general industrial uses are appropriate.

SEPA (3575, 3576, 3577): none stated.

SEPA (3569): A Flood Risk Assessment (FRA) should be included as a development requirement for Proposal MET 008.


Proposal MET 011 Methil Power Station

Forth Ports Ltd (1806): Amend the development requirements to remove: the requirement for a Flood Risk Assessment; the requirement for a design framework; the reference to the Habitats Regulations Appraisal Mitigation and amend the preferred uses on the site to employment led mixed use, including residential development. Revise the boundary of the site to reflect the extent of Forth Ports Ltd ownership. Remove the green network opportunity crossing the site.

Scottish Enterprise (1069): Proposal MET 011 should be designated for Employment uses. The development requirements should reference the necessity of the Leven Link
Road project (Proposal LVA 002) and its benefits and make clear that light and general industrial uses are appropriate.

SEPA (3578): none stated.

**WEST WEMYSS**

**Proposal WWS 001 Wemyss Estate land at West Wemyss**

The Woodland Trust Scotland (2919): Delete proposal WWS 001 from the plan or identify a 10m buffer between the proposed development and the area of ancient woodland in the development requirements.

Wemyss Estate Trustees (2128) and Scottish Environment Protection Agency (3652): none stated.

**WINDYGATES**

**Proposal WDY 001 Balcurvie Meadows**

Persimmon Homes (East Scotland) (1984): Clarify whether the 55 capacity indicated for proposal WDY 001 is the remaining capacity or a total for the site.

**Proposal WDY 003 Cameron Bridge**

SEPA (3650): none stated.

**Sites (not in the Proposed FIFEplan LDP) proposed by Objectors**

The William Brown Trust (3893): Allocate candidate site LDP-WDY 001 as a housing site

Alec MacPherson (1694): Allocate candidate site LDP-WDY 002 Balcurvie Farm as a housing site.

**COUNTRYSIDE AREA**

**Proposal LWD 029 Silverburn Park, Leven**

SEPA (3570): none stated.

**Summary of responses (including reasons) by planning authority:**

**LEVENMOUTH AREA**

Levenmouth area issues

NHS Fife (3854): Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will
be "on-demand" provision or upgrades to existing provision.

Proposal LVA 001 Levenmouth Strategic Development Area

Wemyss Estate Trustees (2094) and Scottish Enterprise (3915): support for proposal LVA 001 is noted. Regarding the reference to the Levenmouth Link Road proposed by Scottish Enterprise, Fife Council considers that there may be merit in adding the following text to proposal LVA 001, and invites the Reporter to make an appropriate recommendation on this issue:

‘The Levenmouth Link Road project (LVA 002) proposes road enhancements to make Lower Methil, the waterfront area and Energy Park Fife more accessible, and passes through the Strategic Development Area. The line of the road through the Levenmouth Strategic development area is indicative only – the final route will be determined through the masterplanning process’.

The Levenmouth Strategic Development Area – Development Framework Diagram presented in FIFEplan (page 134) was approved by Fife Council as part of the Levenmouth Strategic Land Allocation – Strategic Framework in November 2012 (see supporting document SD5 page 25). It is anticipated that a Pre-Application Notice (PAN) will be submitted for the Strategic Development Area in late Spring 2015 and that more detailed masterplanning of the site will start at that time. The issues raised by Diageo (1148) regarding the proximity of new housing to their Cameronbridge operations will be considered in detail through that process (as highlighted by Wemyss Estate Trustees (2094) in their representation). It is noted that Green Network Priorities identified for the site include provision of a robust landscape framework, specifically referencing the need to mitigate road noise from the A915, which separates the Strategic Development Area from Diageo’s site.

Fife Council is working in partnership with local group CLEAR to upgrade existing greenspace at Starkies Wood to create a community garden/woodland. Since the consultation on FIFEplan, discussions have been held with CLEAR regarding the route of the road adjacent to the High School and Starkies Wood community garden. It is understood that some land from the community garden and from the common good park is likely to be required for the proposed road network; however efforts are being made to minimise or mitigate the impacts of the road improvements on these greenspaces. These discussions have addressed the issues raised by CLEAR (2036) and proposed improvements to Starkies Wood community garden will be carried out by Fife Council as the contractor for the works with full consideration given to the likely route of the proposed link road. CLEAR will be kept informed of progress on the link road proposals and their acknowledgement that these improvements are ‘badly needed’ is noted.

Fife Council agrees that the capacity for proposal LVA 001 in the Fife Local Development Plan Action Programme is a drafting error and should be amended to reflect the correct capacity for the proposal (1650 units) (see supporting document SD6 page 53)

The developer requirements for this proposal refer to the provision of 15Ha of employment land. It is now known through the Strategic Development Framework and recent approved planning applications that the amount of land identified for employment uses will be 13.8Ha. This is reflected in the Fife Employment Land Strategy (see Core Document CD18, pages 15 and 16). Fife Council considers there is merit in amending
the required employment provision for Proposal LVA 001 from 15ha to 13.8 hectares in line with the Fife Employment Land Strategy and invites the Reporter to make an appropriate recommendation on this matter.

Proposal LVA 002 Levenmouth Link Road

The support for the Levenmouth Link Road from Scottish Enterprise (3867) is noted. Employment sites are exempt from planning obligations so it is not clear why the various employment proposals in the area should reference the link road apart from those that the road may pass through or be adjacent to (MET 005, MET 009). Fife Council considers, however, that there may be merit in adding the following text (taken from Proposal MET010) to proposals MET005 and MET009, and invites the Reporter to make an appropriate recommendation on this issue:

‘The Levenmouth Link Road project (LVA 002) proposes road enhancements to make Lower Methil, the waterfront area and Energy Park Fife more accessible’.

The Levenmouth Link Road, as it applies to the Levenmouth Strategic Development area, is a local obligation to be delivered onsite by the developer. A future revision of the Planning Obligations Supplementary Guidance could clarify this by specifically referencing the Levenmouth Link Road in Figure 7 of the guidance (see CD47 page 23).

FIFEplan shows an indicative line for Proposal LVA 002, part of this line as shown passes through the land identified by Forth Ports as part of the operational port. This is unsurprising as the intention is that the road would also serve the port area. The line shown in FIFEplan is that same as was used in the Mid Fife Local plan and the Levenmouth Area Local Plan before that and does not take into account the delivery of a roundabout and connections along Methil High Street. To date there has been no detailed investigation of the route of this road should take and detailed discussions will be held with Forth Ports at the appropriate time.

In response to the comments made by Forth Ports Ltd (1779) however, Fife Council considers that there is merit in amending the route of the indicative line of LVA 002 to align with the existing road which passes along the northern edge of the port area, as this would tie into the road improvements which have been delivered to date, and invites the Reporter to make an appropriate recommendation on this issue.

With regard to the point made by Scottish Enterprise (3867), Fife Council considers that there may be merit in giving a clearer indication of proposal LVA 002 on the mapping and invites the Reporter to make an appropriate recommendation on this issue.

BUCKHAVEN

Proposal BKN 002 Factory Road

Long term thinking on the land to the north of proposal BKN 002 is that it could become employment land in the future as an extension of the Muiredge employment land. The employment designation for Proposal BKN 002 is to ensure that any development of that site would not restrict future employment uses on the land immediately to the north. A green network priority has been identified for proposal BKN 002 that requires the integration of a high quality pedestrian and cycle route along the southern perimeter of the site to provide a more direct route into and out of Buckhaven. This should address
the concerns raised by CLEAR (2180) regarding future access through the site.

COALTOWN OF WEMYSS

Proposal CLW 002 Land South of Coaltown of Wemyss

Wemyss Estate Trustees (2117): Support for FIFEplan position is noted. The Woodland Trust Scotland (2873): Proposal CLW 002 has already been granted planning permission in principle so it is appropriate to identify the site as suitable for housing in FIFEplan. The development requirements (green network priorities) for proposal CLW 002 already include the following text:

‘No development should be within 10m of adjacent area of woodland’.

The requirement for more detailed survey work on protected species will be determined as part of any planning application process.

EAST WEMYSS

Proposal EWS 001 West of Randolph Street

Lindis Cunningham (1526): This site was identified for housing in a masterplan that was granted planning permission in the 1990’s and which is still extant. The site is not on prime agricultural land. The development requirements for the site include a number of green network priorities that will help to mitigate the impact of development on wildlife by maintaining habitat connectivity and protecting the woodland. It is therefore considered that this proposal should remain in FIFEplan.

Wemyss Estate Trustees (2121) and Scottish Environment Protection Agency (3400): Support for FIFEplan position is noted.

KENNOWAY

Kennoway Issues

Agnes Adams (27), Kennoway Community Council (856): Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision. Detailed matters, such as the specifications of road access and drainage arrangements for example, will be dealt with at planning application stage.

Proposal KEN 002 Land between Halfields Gardens and Leven Road

Miss King (13, 950), John Bissett (1473), The Woodland Trust Scotland (2897), Sandy Simpson (3720) and the Scottish Environment Protection Agency (3530): Fife Council has previously refused development on part of this site because at that time it would have represented development in the countryside. The FIFEplan process has reviewed sites across Fife to identify those most suitable to contribute towards meeting the
Proposed Fife Local Development Plan

The site slopes down towards the Meggie Burn but the gradient is not considered to make development unviable. The development requirements include the requirement for a Flood Risk Assessment which will identify any flooding issues, there is also a requirement to provide a 10m buffer strip along the watercourse and adjacent to the woodland to the east of the site. These requirements are supported by Scottish Environment Protection Agency (3530) and should satisfy the request by The Woodland Trust Scotland (2897). The development requirements for the site include a number of green network priorities that will help to mitigate the impact of development on wildlife by protecting habitat assets and maintaining habitat connectivity. The requirement for more detailed survey work on protected species will be determined as part of any planning application process.

Issues of disruption during construction will be addressed through conditions for any detailed planning permission granted for the site. The issues raised regarding loss of views and reduction in property values are not material planning considerations.

Proposal KEN 003 Langside Crescent, South

Kenneth Greer (104), Janice Smith (17), Harry Marshall (126), Agnes Adams (3908): Development of this site, which represents medium scale development, is consistent with SESplan strategy. The site could contribute 25 houses towards meeting the SESplan housing land requirement. The FIFEplan site assessment process has not identified any concerns regarding access to the site or traffic safety as a result of additional traffic generated by development on this site or alongside development on proposals KEN 004 and KEN 006 (27). However these issues will be considered in more detail at planning application stage.

The scale of development proposed on the site (25 units) represents a medium density of around 32 houses per hectare, which is considered to be appropriate to the location of the site close to local services and public transport.

Issues of noise, loss of privacy, overshadowing and parking will be considered through the planning application process (104, 17, 126). Potential depreciation in property values (17, 126) is not a material planning consideration.

The land covered by Proposal KEN 003 is not designated as protected open space in the adopted Mid Fife Local Plan.

There is no evidence of a planning agreement having been made to designate this area as open space as claimed by Agnes Adams (3908) and the land has not been designated as protected open space in previous versions of the Local Plan.

Proposal KEN 004 Langside Crescent

The capacity of 25 shown for proposal KEN 004 is an error; the capacity for the proposal...
should be 5 as stated by Agnes Adams (3886). FIFEplan has been amended accordingly prior to the examination.

Sites (not included in the Proposed FIFEplan) proposed by Objectors

Jim Howie (1974): Analysis of the findings of the site assessments concluded that the land designated as proposal KEN 002 (Land between Halffields Gardens and Leven Road) in FIFEplan was the most appropriate additional housing site to allocate within the Kennoway and Windygates area. Proposal KEN 002 is within easy walking distance of facilities and services within Kennoway local centre and within reasonable walking distance of the Primary School. Development on the site would have the potential to integrate fairly well with the surrounding communities and to creating new linkages between two currently separate parts of Kennoway. Development of proposal KEN 002 would grow Kennoway as a compact settlement.

Development on Candidate site LDP-KEN 001 would be within easy walking distance of the primary school but much further from the centre of Kennoway. Development on the site would have poor integration with the rest of Kennoway and would represent ribbon development; extending the settlement beyond Langside Road, which currently forms an effective boundary to the settlement. For these reasons it was considered that Proposal KEN 002 was the preferred site for new development.

It is considered that all the sites allocated in the FIFEplan Local Development Plan will meet the tests of effectiveness as set out in Planning Advice Note 2/2010 Affordable Housing and Housing Land Audits (CD10 paragraph 55 page 17 and CD11). Further discussion on the housing land position is contained within Issue 2B Homes.

LEVEN

Leven Issues

Eleanor Todd’s (118) suggestion regarding the suitability of land along Largo Road for new housing development is noted. However, at present there are no sites being promoted for housing development in that area beyond the allocated housing site proposal LEV 003 (Land at Cupar Road).

Proposal LEV 001 Leven Vale South & Proposal LEV 002 Leven Vale West

Persimmon Homes (East Scotland) (1981 & 1982): The 2014 Housing Land Audit provides the up to date position with regards the phasing of housing numbers, the number of completed houses on this site and how many units are remaining (see Core Document CD11, page 52). More detail on the provision of an effective housing land supply is dealt with under Issue 2b Homes.

Proposal LEV 003 Land at Cupar Road

Deborah Vanstone (730), I & A Clark (1885): Proposal LEV 003 (land at Cupar Road) is allocated in the adopted Mid Fife Local Plan. The site was added as a recommendation from the Examination into the Mid Fife Local Plan in 2012 (see Core Document CD20, page 435). It was therefore considered appropriate to continue to identify the site for housing in FIFEplan.
Proposed LEV 005 Thornton and Leven to Westfield rail lines & LEV 008 Bawbee Bridge

Fife Council acknowledges the comments made by Transport Scotland (3217 & 3222) regarding proposals LEV 005 & LEV 008 but wishes to retain the proposals within FIFEplan as these represent the aspiration of the Council to reinstate the rail link to the Levenmouth Area. On 25th September 2014 Fife Council reaffirmed its commitment to ‘improve the strategic transport links that underpin our local economy’ (see Supporting Document SD7 – Minute of Fife Council meeting 25th Sept 2014, page 9, point 3, 4th bullet) and Councillor David Ross made the following speech:

“Fourthly, we will press forward with Connecting Fife - improving the strategic and local transport links that underpin our local economy. Working with Transport Scotland and building on our recent meeting with the Scottish Transport Minister we will make the case for the Levenmouth Rail Link...” (see Supporting Document SD8 Copy of Cllr David Ross’s speech page 3).

There is ongoing dialogue between Fife Council and Scottish Government regarding the Levenmouth Rail Link as made clear in a recent letter from Derek MacKay MSP Minister for Transport and Islands see SD9.

The provision of strategic rail infrastructure is primarily the responsibility of the network operator and government agencies. Where a Transport Appraisal shows that improvements to the rail network are necessary this will be considered under the requirements of Policy 4 and the Planning Obligations Supplementary Guidance.

In response to the comments made by Scottish Enterprise (3868), Fife Council considers that there would be merit in providing a clearer indication of the route of proposal LEV 005 on the mapping and invites the Reporter to make an appropriate recommendation on this issue.

SEPA (3550): support for the FIFEplan position is noted.

Sites (not included in the Proposed FIFEplan) proposed by Objectors

Muir Homes Ltd (894): Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with under Issue 2b Homes.

This site was deemed unsuitable for development by Reporters in the Kirkcaldy and Mid Fife Local Plan Examination because they considered that the adjacent housing site, (FIFEplan proposal LEV 002), provides a logical conclusion to the settlement and that further linear extension in this area would lack good integration with or access to Leven or Windygates town centres. They concluded that development on this edge of Leven would compromise the physical separation of Leven and Windygates and the landscape setting provided by the green corridor along the River Leven Valley (see CD20 page 431).

It is considered that development on this site would: have a significant impact in settlement form and landscape terms; be very poorly integrated with Leven, Methil or Windygates; would produce ribbon development along the A915; and create coalescence issues with Windygates. For these reasons development is not supported on this site.
METHIL & METHILHILL

Methil and Methilhill Issues

Forth Ports Ltd (1762): Support for the established employment designation on the operational port area is noted. Their reference to green networks within the operational port appear to relate solely to proposal MET 011 (Methil Power Station) and is addressed below along with their comments regarding the designation of the land identified as proposal MET 011. Fife Council’s response to the issue of the indicative road line on operational port land is as given under our response to Proposal LVA 002 Levenmouth Link Road, above.

Proposal MET 004 Glencast Foundry

SEPA (3574): Support for FIFEplan position is noted.

Proposals MET 005 (Land north of Bayview Football Stadium), MET 006 (Ajax Way), MET 007 (west of Doctors Surgery), MET 008 (West of Thompson House), MET 009 (Barclay Brothers site), MET 010 (Energy Park Fife)

Scottish Enterprise (1063, 1064, 1065, 1066, 1067 & 1068): The Fife Employment Land Strategy (FELS) approved by Fife Council in 2014 complements FIFEplan, ensuring that Fife maintains adequate employment land across key settlements. It provides additional detail on employment sites including appropriate use classes (see Core Document CD18 technical report page 27-28). There are a few errors/omissions in the use classes identified in FIFEplan for the employment sites in Methil. Fife Council considers there is merit in making the following changes to keep FIFEplan consistent with the Fife Employment Land Strategy, and invites the Reporter to make an appropriate recommendation on this issue:

- Proposal MET 006, Methil Docks Business Park – Ajax Way should be identified for use classes 4, 5 and 6;
- Proposal MET 009, Energy Park Fife – Barclay Brothers site should be identified for use classes 4, 5 and 6;
- Proposal MET 010, Energy Park Fife should be identified for use classes 4, 5 and 6 (energy).

FIFEplan does not distinguish strategic employment sites from more general employment sites; that classification is contained within the Fife Employment Land Strategy. Of the sites promoted by Scottish Enterprise as strategic employment, only MET 010 is identified as a strategic employment site in the Fife Employment Land Strategy. Any changes to the status of these sites would need to be addressed through the next review of the employment land strategy for Fife.

The Scottish Environment Protection Agency (3569) advise that Proposal MET 008 should include the requirement for a Flood Risk Assessment in the development requirements. Fife Council considers that there is merit in adding this requirement into the development requirements for this proposal and invites the Reporter to make an appropriate recommendation on this issue.

CLEAR (2184): In the adopted Mid Fife Local Plan the Fife Energy Park (adopted Plan proposal MET14) was included within the settlement plan for Methil and Methilhill as the
majority of the site was considered to be within the Methil Area (note: there are no clear boundaries between the settlements within the Levenmouth area). In the proposed FIFEplan the north eastern part of the Fife Energy Park employment site has been designated as established employment land as it has been developed. The remainder (Proposal MET 010) has been included within the Methil and Methilhill settlement plan despite this land being mainly within the Buckhaven area. This is a continuation from the adopted Local Plan position but Fife Council consider that there may be merit in amending this as requested by CLEAR and invites the Reporter to make an appropriate recommendation on this issue.

Proposal MET 011 Methil Power Station

Scottish Enterprise (1069) and Forth Ports (1806): The inclusion of a requirement for a Flood Risk Assessment as part of the development requirements for Proposal MET 011 was recommended and supported by the Scottish Environment Protection Agency (see Supporting Document SD10, page 5). The requirement for a Flood Risk Assessment has been included in the development requirements for proposals that are at risk from flooding throughout FIFEplan.

This site was identified as a brownfield opportunity site in the adopted Mid Fife Local Plan (proposal MET11 – see Core Document CD7, pages 156-157), with preferred uses of leisure and tourism, and so has not been allocated as an employment site for some time. In addition the site is not identified as an employment site in the Fife Employment Land Strategy and it not clear how the site forms part of the operational port at Methil, beyond the fact that it is owned by Forth Ports. There is a lack of clarity over Forth Port’s intentions regarding the site, they stress that it forms part of the operational port and forms a public hazard so that public access should be restricted whilst proposing future residential uses on the site.

This is a prominent site close to Leven town centre, and as such the site is not considered appropriate for general industrial uses. The previous local plan identified an existing interconnector on the site which was to be retained and safeguarded for renewable energy uses. It is understood from discussions that Fife Council has had with Forth Ports and Scottish Power that this existing infrastructure is no longer usable and therefore FIFEplan no longer refers to the interconnector.

The former power station site was considered in detail through a review of development sites in and around town centres in Fife, the preferred uses identified for the proposal were as a result of this review, but alternative uses would be considered (hence the use of the term ‘preferred’). It is therefore considered that the designation of the site as a development opportunity and the uses identified are appropriate and flexible enough to accommodate alternative uses if they comply with other policies in FIFEplan. Forth Ports were invited to be part of the charrette in Levenmouth on a number of occasions, they chose not to attend the event but did make clear that they had no clear development aspirations for the port but wanted the site to ‘remain zoned for employment use’. These comments were taken into account through the charrette (see Supporting Document SD11).

It is considered that the outcomes from the Levenmouth Charretteplus event 2013 were not overly prescriptive (see Supporting Document SD12, pages 67-72). For Proposal MET 011, they identify the importance of the frontage towards Leven and some key connections and views across the site. The green network priorities identify similar
priorities for the site. The green network opportunity shown across this site is an indicative line which relates to the desire for a high quality edge to be created facing the waterfront and improved links to be provided to the Leven Valley area. It is considered that these design principles could easily be accommodated within the masterplan for the site referred to by Forth Ports should their proposed uses be acceptable. The wording of the proposal could be revised slightly to reflect this. Issues of public safety and detailed design proposals would be considered at planning application stage and would depend on the uses being proposed at that time.

WEST WEMYSS

Proposal WWS 001 Wemyss Estate land at West Wemyss

The Woodland Trust Scotland (2919), Wemyss Estate Trustees (2128) and Scottish Environment Protection Agency (3652): This site was identified for housing in a masterplan that was granted planning permission in the 1990’s and which is still extant. Planning Permission in Principle for residential/leisure/commercial tourist related development was granted in 2010 and there is a more recent planning application for 54 houses (13/01684/ARC), which is still awaiting determination. It would therefore not be reasonable to delete the site from the proposed plan as requested by The Woodland Trust Scotland. The development requirements for the site include green network priorities that will help to mitigate the impact of development on the woodland on and around the site. The requirement for more detailed survey work on protected species will be determined as part of any future planning application processes.

WINDYGATES

Proposal WDY 001 Balcurvie Meadows

Persimmon Homes (East Scotland) (1984): Proposal WDY001 was granted planning permission for 55 houses in 2005. The 2014 Housing Land Audit provides the up to date position with regards the phasing of housing numbers, the number of completed houses on this site and how many units are remaining (see Core Document CD11, page 55). More detail on the provision of an effective housing land supply is dealt with under Issue 2b Homes.

Proposal WDY 003 Cameron Bridge

SEPA (3650): Support for FIFEplan position is noted.

Sites (not in the Proposed FIFEplan LDP) proposed by Objectors

The William Brown Trust (3893) and Alec MacPherson (1694):

Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with under the Issue 2b Homes Schedule 4 and its associated supporting paper.

Candidate site LDP-WDY 001

It is accepted that the flooding issues have been considered through previous planning processes and that the conclusion at that time was that 'flood risk is not an
insurmountable obstacle to development’ (see Supporting Document SD13 Appeal decision PPA/250/807, pages 2-3, paragraph 6). In their comments on the FIFEplan candidate site, the Scottish Environment Protection Agency advise that a new Flood Risk Assessment would be required if the site were to be identified for development, as the one previously submitted did not extend far enough downstream (Supporting Document SD14, 2013_03_28, SEPA Appendix 3, Fife Site Assessments spreadsheet, row 143).

Education capacity is one of many issues taken into consideration when allocating sites and is not the sole reason why this site has not been allocated. The Windygates and Kennoway area is outwith the strategic development areas identified in SEŚplan. The scale of new housing allocations in the area should therefore represent more local scale development to meet local needs. The adopted Local Plan already identifies a number of housing sites of varying sizes in the area. These have been augmented by two additional sites in Kennoway. It is considered that these allocations meet the local requirement at the present time and provide a good range of locations and site sizes within the area.

Candidate site LDP-WDY 002

Mr McPherson has identified an alternative access that can be provided from Kennoway Road into the site. The transportation and access summary for the site assessment was subsequently revised (see Core Document CD15, Part 13, page 62), which concluded that:

‘The site promoter has provided an option for an alternative access onto Kennoway Road by demolishing a couple of houses. It is agreed that this would be acceptable in terms of visibility although agreements would need to be made with adjoining properties. A site of this size will require multiple access points to ensure connectivity and integration with the existing village. However there are no other suitable access points available. This would result in a large development isolated from the existing community which is not in accordance with the principles of ‘Designing Streets’

It is therefore considered that the proposed access arrangements into the site are insufficient to accommodate the scale of development that is being proposed on the site despite the provision of an alternative access.

The proposed open spaces to the north of the site and below the pylons, along with appropriate landscape planting could help minimise adverse landscape and visual impact from development on the site. However, as highlighted in the landscape assessment, this area contains a series of small holdings creating a distinctive character edge to the north of Windygates. The assessment concludes that this area should be protected from further urbanisation/coalescence with Kennoway.

COUNTRYSIDE AREA

Proposal LWD 029 Silverburn Park, Leven

SEPA (3570): Support for FIFEplan position is noted.
REPORTER’S CONCLUSIONS:

LEVENMOUTH AREA

Levenmouth area issues

1. I acknowledge that organisations such as NHS Fife have previously been consulted during the preparation of the proposed plan and in some cases enhanced or upgraded provision already planned. I have no reason to believe that discussions between the relevant parties will not continue. Such discussions can take place irrespective of whether they are mentioned in the plan. I conclude that the proposed plan need not be altered.

Proposal LVA 001 Levenmouth Strategic Development Area

2. This proposal was a Strategic Land Allocation in the Mid Fife Local Plan - 2012. It will include employment land, a new primary school, areas of open space, green links and neighbourhood/community facilities as well as residential development. On my site inspection I noted that new educational facilities for the Levenmouth Campus of Fife College are now well under construction. I am also aware that a Proposal of Application Notice (PAN) was submitted in summer 2015 and early community consultation has begun. A formal request under Regulation 14 of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2011 for a formal Scoping Opinion from Fife Council on the scope of an environmental impact assessment has been submitted and an application is expected in 2016. A planning application for an internal road layout on part of the employment land has also been approved.

3. While recognising the concerns expressed about the proximity to the Diageo distillery, I agree that such matters can be dealt with at the pre-application and detailed master planning stages. In order to ensure that such matters are considered at that time and given the possible impact on the amenity of adjacent housing, a detailed reference to the Diageo site should be made under the development requirements for the site.

4. Similarly I find that the impact of the route of the road on the community garden at Starkies Wood and the common good park adjoining the High School is an important consideration which should be taken into account at the pre-application and detailed master planning stages. Having visited the site, I find it hard to envisage how some land from these green spaces will not be required to accommodate the new road. However, as in the case of any development, this must be balanced against the recognised benefits which the road network improvements will bring to the area. In order to ensure that the impact on these important green spaces is adequately addressed, I recommend that a detailed reference to both minimising and mitigating any impacts should be added to the development requirements for this site and for LVA 002, Levenmouth Link Road.

5. The detailed requirements for the site include the provision of 1,650 houses of which a minimum of only 5% affordable units is requested. This compares to a requirement of up to 30% in other areas of Fife and should help to improve the mix of housing types in the area.

6. Finally I accept that a reference to the benefits of the Levenmouth Link Road project should be provided and I have adopted the council’s suggested wording. The reference
to the impact on the community garden and common good park can also be included in this section.

7. I note that the council has no objection to the correction of the site capacity in the action programme which accompanies the local development plan. However, I have no remit to recommend changes to the action programme. This would be a matter for the council.

8. No representation has been submitted objecting to the level of employment land required on the site. Therefore have no remit to recommend changes to the figure in the proposed plan.

Proposal LVA 002 Levenmouth Link Road

9. Following my further information request FIR 44, the council has clarified where the proposed alternative indicative route for the link road would be located. The proposed alternative route would follow an existing road and tie into road improvements which have already been made. I agree that this would be a more logical route to show. From the maps provided, the route still appears to pass through land covered by the operational Port of Methil but given that it is following an existing road and that one of its purposes is to serve the port area, I am satisfied that this approach is acceptable. I conclude that the proposals map should be amended accordingly.

10. I agree that reference to the link road should only be made under the employment sites which it passes through or is adjacent to. Reference should therefore be added under sites MET 005 and MET 009. I do not consider it necessary or helpful to include such a reference under all the employment sites in the area.

11. Reference to the part funding of the Link Road through planning obligations is already made under site LVA 002. I note the council’s intention to include more specific references in a future revision of the Planning Obligations Supplementary Guidance. I have no remit to comment on the contents of the council’s supplementary guidance but consider existing references in the proposed plan to be adequate.

12. Improvements to the graphic representation of the link road on the maps accompanying the proposed plan can be made by the council without my formal recommendation, as a minor modification.

BUCKHAVEN

Proposal BKN 002 Factory Road

13. This site’s proposed allocation as employment land would not be inconsistent with its current allocation as a brownfield opportunity site in the Mid Fife Local Plan. There are no proposals to allocate the area of land to the north-west of the site for housing in the proposed plan. I note the council’s longer term intention that the land could be part of a future extension of the Muiredge employment land. With existing employment land to the east, I agree that this area would provide the opportunity for a logical extension to employment provision in the area but I do not regard this as an essential precursor to the allocation of the Factory Road site for employment use. The case for such an extension could be investigated through a future local development plan.
14. From my site inspection, the existing footpath along the southern edge of the site appeared well used and I agree that access should be retained in any future development on the site. The development requirements for the site set out in the proposed plan include a high quality pedestrian and cycle route along its southern perimeter to provide a more direct route into and out of Buckhaven and state that public access along the Coastal Path must be maintained. I do not consider that further changes to the proposed plan are necessary.

15. In conclusion, I am satisfied that the proposed allocation of this land for employment use is appropriate.

COALTOWN OF WEMYSS

Proposal CLW 002 Land South of Coaltown of Wemyss

16. I note that this site has already been granted planning permission in principle but accept the importance of preventing development which would lead to loss or damage of the adjacent area of ancient woodland. I agree that sufficient buffering between the proposed development and woodland should be provided. The development requirements for the site in the proposed plan currently state that no development should be “within 10 metres of the adjacent area of woodland”. However, ancient woodland is not mentioned and I consider that the extent of the buffer strip would better be decided from detailed survey work through the development management process. I conclude that the proposed plan should be amended to include reference to the ancient woodland and the likely need for a protective strip, the extent of which would be determined following a detailed survey.

17. Policy 13 (Natural Environment and Access) seeks to protect or enhance natural heritage and access assets including protected and priority habitats and species. It states that development proposals must provide an assessment of the potential impact on natural heritage, biodiversity, trees and landscape. I am satisfied that this policy provides adequate protection for protected species, if present on this housing site, and do not consider that further additions to the proposed plan are required.

EAST WEMYSS

Proposal EWS 001 West of Randolph Street

18. This site is designated as part of an historic garden and designed landscape and is located outside the settlement envelope of East Wemyss in the Mid Fife Local Plan. I note that the site has a long standing permission (since the 1990’s) for residential development as part of a wider Wemyss masterplan and the landowner’s continued support for housing on the site. The council has confirmed that this permission is still extant.

19. While I acknowledge the concerns expressed about the loss of farmland and possible adverse impact on wildlife, the site is not identified as prime agricultural land and carries no formal nature conservation designation. No objection to the development of the site has been received from Scottish Natural Heritage or any other nature conservation body. The development requirements for the site included in the proposed plan recognise the presence of woodland/mature trees and the need for any development to respond appropriately to the rural character of the site. A green network
connection through the site will be required to link the development and East Wemyss to the wider coastal core path network. Policy 13 (Natural Environment and Access) provides additional protection for natural heritage assets.

20. Given these safeguards and the extant planning permission, I am satisfied that the allocation of this housing site should remain in order to contribute to the housing requirements of the SESplan area. Issue 2b (Homes) provides a detailed assessment of the proposed plan’s housing strategy.

KENNOWAY

Kennoway – general

21. The council has responded through further information request FIR 45 that the policy for affordable housing provision in Kennoway is set out in its Affordable Housing Supplementary Planning Guidance – 2014. This identifies a requirement for 10% affordable housing provision from new housing developments and is referred to in Policy 2 (Homes) of the plan. This figure is based on the council’s analysis of the local housing need for Kennoway and I have no evidence to contradict this assessment. I am also aware that the council intends to review the supplementary guidance at least every 2 years to reflect changing circumstances, new national guidance or housing needs assessments. These reviews can take into account any evidence to question the approach currently taken by the council.

22. I have noted the concerns expressed about infrastructure provision (roads, education, health services and employment opportunities). In response, the council states that service providers have been involved in the preparation of the local development plan and I have not been informed of any concerns from providers with regard to the level of development proposed in Kennoway. The provision of supporting infrastructure for any particular site is not regarded by the council as insurmountable. In addition, Policy 3 (Infrastructure and services) and Policy 4 (Planning obligations) seek to ensure that the required levels of infrastructure are delivered. I therefore have no reason to believe that appropriate provision could not be made. I also note that a new site east of the Sandy Brae Industrial Estate has been allocated for employment uses including business, general industrial and storage and distribution providing further opportunities for employment in Kennoway.

23. Detailed site assessments have been carried out by the council for each of the proposed new housing allocations in Kennoway. The council’s transport section has been consulted and I have not been provided with any indication that access along Langside Crescent would inhibit development of sites KEN 003, KEN004 or site KEN 006 or cause undue congestion when combined with traffic from the school. (I note that planning permission was approved for 24 affordable residential units on part of site KEN 006 on 20 October 2015). On my site inspection, I did not see any reason to disagree with the council’s assessment that suitable access arrangements could be achieved for this number of houses and also noted that there is an existing pedestrian access to Cupar Road, from Langside Crescent, providing an alternative means to access the sites and the school. Details of how to manage the increase in traffic and any traffic calming/control related measures necessary both during and after construction would be dealt with at the detailed planning application stage.

24. Unfortunately, some adverse impacts on the amenity of existing residents during
Construction will be inevitable for those living close to any housing or other development site. However, these can be minimised through planning conditions controlling noise/dust at the planning application stage. These impacts, for a temporary period during construction, do not justify the deletion of the housing sites. I noticed on my site inspection, that work on site KEN 004 is still not complete but, once started, the length of time taken to complete a site is outwith the control of the planning system.

25. No change to the proposed plan is required.

Proposal KEN 002 Land between Halfields Gardens and Leven Road

26. This 12.2 hectare site, to the east of Kennoway, is one of the larger housing sites proposed for allocation outside a Strategic Development Area. It is located outside the settlement envelope in the Mid Fife Local Plan and is largely agricultural with former landfill on and adjacent to the west. The site is partially contained by existing housing to the north and south, with the King George’s Field greenspace to the west and open countryside to the east. Following my site inspection, I concur with the view that the site is relatively contained within the landscape. I also agree with the council that the position of the site offers the opportunity to integrate reasonably well with the existing settlement and the services provided in the local/neighbourhood centre. It is estimated to have capacity for approximately 190 units which will make a contribution to meeting the housing requirements contained in SESplan. Issue 2b (Homes) provides a detailed assessment of the proposed plan’s housing strategy. A representation has been received from the landowner stating that the site is effective and available for development in the short term.

27. The undulating site is split by and slopes down towards Meggie Burn. I note that a flood risk assessment will be required together with a buffer strip along the watercourse and that the Scottish Environment Agency has not objected subject to these requirements. Given the extent of the site, the low density of development proposed and the opportunities to avoid development on the steepest slopes, I do not regard the topography or drainage issues as constraints which could not be overcome through a high quality design and layout. I welcome the development requirement contained in the proposed plan that a development framework is required which can look at these issues in more detail.

28. Following further information request FIR 79, the council has confirmed that multiple access points to this development site would be required and that it is possible that 2 vehicular access junctions can be constructed from Leven Road, to the south of the site. I am also aware of the opportunities available to ensure good pedestrian links with the wider built-up area via Halfields Gardens, King George’s field and Seton Court. I am, therefore, satisfied that transport/access issues can be overcome. The enforcement of matters involving speed restrictions are the subject of other regulatory authorities and not a matter for control through the planning process.

29. I acknowledge the concern expressed about adverse impacts on wildlife. However, the site is not covered by a formal nature conservation designation. The development requirements for the site included in the proposed plan recognise the presence of the watercourse, woodland, wetland habitat and unimproved grassland habitat along the Meggie Den. A new high quality network will be required along the watercourse to incorporate high quality habitat provision. Policy 13 (Natural Environment and Access) of the plan provides additional protection for natural heritage assets including protected
and priority habitats and species. I consider that these safeguards will ensure that the impact on nature conservation interests is not unacceptable.

30. I agree that sufficient buffering between the proposed development and woodland should be provided. The development requirements for the site in the proposed plan currently state that no development should be “within 10 metres of identified woodland”. However, ancient woodland is not mentioned and I consider that the extent of the buffer strip would better be decided from detailed survey work through the development management process. The proposed plan should be amended to include reference to the ancient woodland and the likely need for a protective strip, the extent of which would be determined following a detailed survey.

31. As suggested by the council, impacts on the amenity of existing residents including from noise and dust during the construction phase can be minimised by the use of planning conditions at the planning application stage. Disruption to gas/electricity and water supplies would be the responsibility of the individual utilities provider. I have insufficient information to conclude that such interruptions would occur.

32. In accordance with standard planning procedure, loss of views and a possible reduction in property values are not matters I have taken into account in assessing the land use implications of the proposal.

33. Taking all of the above into consideration, I conclude that this site should be retained as a housing allocation in the proposed plan subject to the change to the development requirements outlined above.

Proposal KEN 003 Langside Crescent, South

34. This area of open ground within the settlement of Kennoway has existing housing located to the north and east and a church building, housing site KEN 004 (which is under construction) and existing housing to the west. It is not allocated for residential use in the Mid Fife Local Plan. I am aware of the value attached to the site as an informal open space by the surrounding residents but it is a small infill site which is sustainably located within walking distance of bus stops and local services and will make a contribution to meeting the housing requirements contained in SESplan. Issue 2b (Homes) provides a detailed assessment of the proposed plan’s housing strategy. I do not regard the density of 32 houses per hectare proposed to be inappropriate in such a location.

35. Service providers have been involved in the preparation of the local development plan and I have not been informed of any insurmountable concerns in respect of capacity at local schools or health facilities. In any case, the proposed plan makes provision for appropriate contributions towards infrastructure to be made where necessary in Policy 3 (Infrastructure and services) and Policy 4 (Planning obligations).

36. The transport section of the council considers that a single point of access for a development of this size would be appropriate. I have not been provided with any indication that access along Langside Crescent would inhibit development of this site either alone or in combination with sites KEN004 and site KEN 006 or would cause undue congestion when combined with traffic from the primary school or raise unacceptable traffic safety issues. Following my site inspection, I agree with the council’s assessment that suitable access arrangements could be achieved for this
number of houses. I also noted that there is an existing pedestrian access to Cupar Road, from Langside Crescent, providing an alternative means to access both the site and the school. Details of how to manage the increase in traffic and any traffic calming/control related measures necessary both during and after construction would be dealt with at the detailed planning application stage.

37. Concern has been expressed about the possible impacts on wildlife and trees. I note that the site is not covered by a formal nature conservation designation and no objections have been received either from Scottish Natural Heritage or any other nature conservation group. Policy 13 (Natural Environment and Access) provides adequate protection for natural heritage assets including trees and hedgerows that have a landscape, amenity or nature conservation value as well as protected and priority habitats and species. I do not consider that the possible implications for wildlife justify the removal of this site from the plan.

38. Given the proximity to existing housing, I recognise the potential for disturbance during the construction phase from noise/dust and the possible implications for privacy. However, I am satisfied that any impacts on the amenity of existing residents can be adequately minimised by careful design and layout (taking into account the council’s “Making Fife’s Places – planning policy guidance”) and the use of planning conditions at the planning application stage. I also consider that any implications for resident’s parking is a matter which can be dealt with at the design and planning application stage.

39. This site is not designated as open space in the existing local plan and I have no indication that it has been designated as such in previous local plans or through any legal agreement. I note that the council confirms that there is no evidence of such a planning agreement.

40. In accordance with standard planning procedure, loss of views and a possible reduction in property values are not matters I have taken into account in assessing the land use implications of the proposal.

41. I conclude that site KEN 003 should remain in the plan as a housing allocation.

Proposal KEN 004 Landside Crescent

42. I accept that the capacity for site KEN 004 shown in the proposed plan of 25 dwellings is an error and agree that the figure should be amended to 5 dwellings as suggested.

Candidate site LDP-KEN 001 Land at Crossroads Field

43. This 22.6 hectare site is located to the north-west of Kennoway and is outside the settlement envelope in the Mid Fife Local Plan. Its development would constitute a large scale extension to a village of this size. Even the proposed reduced site (7.5 hectares – 60 dwellings) would extend built development west beyond the current robust boundary of Langside Road and beyond existing development, to the south, on Denvale Gardens. Given the existing clear and defensible road boundaries to the west and north of the settlement in this area, I do not accept that the development of the reduced site would contribute to the natural organic growth of Kennoway. Instead it would breach existing well defined boundaries and represent an encroachment into the open countryside.
44. In any case, 2 new allocations for a further 215 dwellings, plus an existing allocation of 66 from the existing Mid Fife Local Plan are already included in the proposed plan for Kennoway. I regard this level of development to be more than adequate for a settlement of this size over the plan period particularly when the strategy of the proposed plan for the Levenmouth area is for the Levenmouth Strategic Development Area to be the main focus of development. I find that the addition of a further housing site, at this location, for even a reduced number of 60 houses would result in an unacceptable cumulative scale of development for the village.

45. I have noted the comparisons made between the proposed site and the allocated sites in the proposed plan. Although the proposed site would be within walking distance of the primary school, I consider the proposed plan allocations to be more integrated with the existing settlement both visually and by having the potential to provide easier access to facilities and services in the local centre. I recognise that the development of site KEN 002 - Land between Halfields Gardens and Leven Road would also extend development into open countryside to the east of Kennoway. However, because of its topography, site KEN 002 is relatively well contained in the landscape unlike the proposed site. I have also noted the representations made about the deliverability and effectiveness of allocated site KEN 002 but following the council responses to my further information requests (FIRs 46 and 79), I am satisfied that the site is both effective and deliverable. In particular, the road safety reasons for refusal of previous smaller planning applications for part of this site can now be overcome by providing 2 accesses via Leven Road on the much larger allocated site (see paragraphs 26 to 33 above).

46. In conclusion, I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the 5 year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under Issue 2b (Homes) with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that this site would nevertheless be unacceptable because the adverse impacts identified above would outweigh the benefits of addressing any shortfall. The submissions made about the effectiveness/deliverability of this site, its detailed design and the willingness to undertake further assessments/requirements identified in the council’s site assessment do not alter my view.

LEVEN

Leven issues

47. The golf course to the south of Largo Road and agricultural land to the north combine to give a rural character to the part of Leven referred to, which extends beyond existing ribbon development, a single row of houses, along one side of Largo Road. The impression is one of having left the built-up area when travelling out of Leven along this section of road. The suggested development of agricultural land opposite the golf course and towards the access to Blacketyside Farm would extend built development into the open countryside, beyond the settlement envelope in the Mid Fife Local Plan, and would not have a strong connection to the main urban area of Leven.

48. I am also aware following my further information request FIR 47, that neither the landowner or a developer have promoted any of this land through the local development plan preparation process. I, therefore, have no information with regard to its effectiveness. I find that I have insufficient justification to recommend that this land should be allocated for housing given the adverse impact on the character and quality of...
49. In conclusion, I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the 5 year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under Issue 2b (Homes) with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that the development of this part of Leven for housing would nevertheless be unacceptable because the adverse impacts identified above would outweigh the benefits of addressing any shortfall. The need to provide high quality housing or the scenic location of the site do not alter my view.

Proposal LEV 001 Leven Vale South and Proposal LEV 002 Leven Vale West

50. The proposed plan is clear in providing an estimated capacity of 75 and 200 houses. The annual housing land audit provides details on the rate of progress and indicates the number of houses completed along with those remaining. On this basis, no change is necessary to the proposed plan.

Proposal LEV 003 Land at Cupar Road

51. This 5.4 hectare is currently in agricultural use and has existing housing located to both the west and south. It is identified as a Strategic Land Allocation in the Mid Fife Local Plan. The 100 dwellings proposed would make a contribution to meeting the housing requirements contained in SESplan. Issue 2b (Homes) provides a detailed assessment of the proposed plan’s housing strategy. A representation has been received from the landowner stating that the site is effective and can be expected to deliver new housing development during the lifetime of the plan.

52. While recognising the concerns about problems of speeding and increased noise which it is anticipated would result from the increased traffic along Cupar Road, I have been assured by the council throughout this examination that the transport section of the council has been fully involved in the preparation of the local development plan. I have not been informed of any concerns in respect of traffic impacts or safety issues in relation to this site. In any event, having visited the site, given its size and the low density of development proposed I am satisfied that acceptable solutions could be provided through sensitive layout, design and traffic management at the planning application stage. Finally, the council has brought to my attention that it has been resolved to grant planning permission for the erection of 100 dwellings including affordable housing, car parking, landscaping and associated infrastructure on the site, subject to a legal agreement.

53. Taking all of the above onto account, I am satisfied that site LEV 003 should remain as a housing allocation.

Proposal LEV 005 Thornton and Leven to Westfield rail lines and LEV 008 Bawbee Bridge

54. Proposal LEV 005 is described in the proposed plan as “rail line safeguarding” and proposal LEV 008 as “rail halt safeguarding”. They are not described as “rail proposals”. Transport Scotland has objected to their inclusion in the proposed plan as this inclusion implies that the schemes have commitment/justification or approval which is not
considered to be the case. My further information request FIR 48 asked for updated comments from both the council and Transport Scotland on the refresh of the 2008 STAG appraisal. Transport Scotland has confirmed that, due to issues with the work which has been carried out, they are not in a position to retract their original comments as no robust, evidence based appraisal has been undertaken to support the proposals.

55. Paragraph 277 of Scottish Planning Policy states that disused railway lines with a “reasonable” prospect of being reused should be safeguarded in development plans. The council still actively supports the reopening of the Levenmouth line for passenger and freight services and continues to promote it through their Levenmouth Sustainable Transport Study (STAG). I consider that until neither the council or Transport Scotland support these proposals there is still a “reasonable prospect” in terms of Scottish Planning Policy of them being reused. It is therefore important that in the interim they should both be safeguarded from development which would prevent their reuse in the future. I do, however, agree with Transport Scotland that it should be made clear in the plan that at the moment there is no firm commitment/justification or approval from Transport Scotland for either of these schemes. This should be added to the development requirements for the proposals.

56. Improvements to the graphic representation of these proposals on the maps accompanying the proposed plan can be made by the council without my formal recommendation as a minor modification. Until there is a firm commitment to the delivery of these proposals, I do not consider that further emphasis towards their delivery either in the proposed plan or in its accompanying supplementary guidance is necessary.

Candidate site LDP-LEV 001 Duniface Farm, Windygates Road

57. The development of this 11 hectare greenfield site would extend built development west, along the A915 towards Windygates and outside the settlement envelope in the Mid Fife Local Plan. The site is not currently allocated for housing and the existing allocated housing site (LEV 002), which is partially complete, would result in built development finishing directly opposite an employment site on the opposite side of the road. I agree that this results in a logical end to the settlement. Opening up a further area of development west of this point would extend built development into what is currently a natural break between the 2 built-up areas of Windygates and Leven. The development proposed would more than halve the separation distance and create the visual impression when travelling along the A915 of virtual coalescence between the 2 settlements. The resultant adverse impact, both visually and physically, on the settings of both Windygates and Leven, as distinct settlements in their own right, would be unacceptable.

58. The housing on the proposed site, although adjacent to existing development in Leven, would be physically closer to the centre of Windygates and would be poorly integrated with the centres of either. Local services would not be easily accessible by foot although I am aware that public transport services are available from the A915 and it is proposed that buses would access the site itself. As well as 150 new houses (including affordable) it is also proposed to provide significant areas of open space including a football pitch and children’s play area, a site for a shop and an area for allotment gardens. The provision of these community facilities would not, however, outweigh the adverse impact on the landscape and setting of Windygates and Leven. Nor would the landscaping proposed provide adequate mitigation to alleviate these
adverse impacts.

59. In conclusion, I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the 5 year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under Issue 2b (Homes) with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that this site would nevertheless be unacceptable because the adverse impacts identified above would outweigh the benefits of addressing any shortfall. The submissions made about the effectiveness of this site and other sites in the proposed plan do not alter my view.

METHIL AND METHILHILL

Methil and Methilhill issues

60. I have dealt with this representation in relation to green network opportunities and the boundary of the safeguarded employment land notation under Proposal MET 011 Methil Power Station below and in relation to the Levenmouth Link Road under Proposal LVA 002 Levenmouth Link Road above.

Proposals MET 005 Land north of Bayview Football Stadium, MET 006 Ajax Way, MET 007 west of Doctors Surgery, MET 008 west of Thompson House, MET 009 Barclay Brothers site and MET 010 Energy Park Fife

61. I agree that the identification of “strategic” employment sites is better dealt with through the preparation of the council’s Employment Land Strategy which can be updated on a more regular basis than the local development plan to reflect any changes in circumstances. The sites referred to are clearly identified in the local development plan as employment sites and I do not regard the addition of “strategic” as necessary.

62. I note the error in the identification of the appropriate use classes on some of the sites. I accept that the use classes identified should be consistent between the proposed plan and the Fife Employment Land Strategy 2014-2021 (technical report pages 27-28). The proposed plan should be amended accordingly for sites MET 006, MET 009 and MET 010.

63. I have dealt with matters in relation to the Leven Link Road under Proposal LVA 002 Levenmouth Link Road above.

64. Scottish Planning Policy (paragraph 256) states that the planning system should prevent development which would have a significant probability of being affected by flooding or which would increase the probability of flooding elsewhere. Reduction of functional flood plains should be avoided. Development on site MET 008 must conform to these requirements. To ensure this, I agree with the Scottish Environment Protection Agency that a flood risk assessment should be carried out. Thereafter, design of development for the site should take into account the findings of the flood risk assessment.

65. I concur that site MET 010 has a closer relationship with the settlement of Buckhaven than Methil and Methilhill and that its identification under the settlement plan for Buckhaven would be more logical. The proposed plan should be amended accordingly.
Proposal MET 011 Methil Power Station

66. I agree that this cleared, flat site provides a prominent and important development opportunity for the Levenmouth area. I can therefore understand why the council has sought to promote early engagement in what happens on the site through the charrette process. Such innovative approaches are actively encouraged by Scottish Planning Policy (paragraph 6) in order to ensure that opportunities are available for everyone to engage in the planning process.

67. I note Forth Port’s indication that it is their intention to retain the entire port estate, including this site, in port operational use (industrial uses aligned to their commercial operations). While supporting the site’s identification as a development opportunity, Forth Ports argues that the site would be better allocated for employment led mixed uses including residential. However, the site is currently identified as a brownfield opportunity site in the Mid Fife Local Plan with preferred uses of leisure and tourism and has not been designated for employment use for some time. Furthermore, it is not currently in operational use. I am also aware that the site is not identified in the council’s Employment Land Strategy and I am not convinced that, given the large amount of safeguarded and allocated employment land nearby, there is a need for this additional site to be allocated for employment uses.

68. In any event, I am satisfied that the use of the term, “preferred uses” (listed as “leisure, tourism and businesses supporting the development of energy including renewables”) allows for sufficient flexibility to consider alternative uses on the site, if they were to be proposed in the future. I do not regard the requirements as overly restrictive or an undue constraint to the development of the site. I conclude that the site’s existing designation in the proposed plan should not be changed and that the site should remain identified as a development opportunity and part of the wider central area. The requested amendment to the safeguarded employment land boundary (confirmed in Forth Port’s response to further information request FIR 49b ) would not therefore be appropriate.

69. For the same reasons, while recognising that some business uses may be appropriate on this site, I do not consider its identification as a strategic employment site to be appropriate. I have found at paragraph 10 above that reference to the link road should only be made under the employment sites which it passes through or is adjacent to (MET 005 and MET 009). I do not consider it necessary or helpful to include such a reference under all the sites referred to.

70. The green network opportunity notation passes through this site and would provide the opportunity to connect it both physically and visually to the wider urban area and create a high quality waterfront edge/civic space at the mouth of the Leven. Scottish Planning Policy states that planning should protect, enhance and promote green infrastructure including green networks as an integral component of successful place-making (paragraph 220). Policy 11 of SESplan supports the creation of a strategic green network and states that local development plans will identify opportunities to contribute to the development and extension of the green network. On my site inspection I noted the strong visual connections across this site with the centre of Leven. Its development could create a high quality green network link between the employment areas further south and the rest of the town, improving the setting and perception of this waterfront area. I do not regard security issues as insurmountable particularly as Forth Ports are themselves promoting residential use on the site which would appear to create
similar security issues. I find that the green network opportunity notation should remain.

71. Given the prominence and importance of this site for the future development of the Levenmouth area, I consider that the preparation of both a design framework (at the strategic level including general principles/connections) and a master-plan (describing and illustrating how any proposals will work on the ground) would be appropriate for this site. Any proposed development must be of a high quality and detailed design guidance will be an essential element in achieving this aim. Although I agree that reference to the charrette process is appropriate to ensure that the views of all are taken into account in the development of this important site, I acknowledge that the development requirement to “reflect” the recommendations from the charrette could be too prescriptive. I conclude that the wording of the development requirements for this site should be amended to refer to a master-plan for the site and to “take into account” the recommendations from the charrette.

72. I am satisfied that the references to the need for a flood risk assessment (supported by the Scottish Environment Protection Agency) and habitats regulations appraisal mitigation are essential as a result of the coastal location of this site and its proximity to the Firth of Forth Special Protection Area. While such matters are addressed elsewhere in the proposed plan and/or by other statutory requirements, this will ensure that any prospective developer is immediately aware of these important issues. No change to the proposed plan is necessary on this matter.

WEST WEMYSS

Proposal WWS 001 Wemyss Estate land

73. The proposed site for housing/leisure/community/commercial development lies to the west of West Wemyss and includes areas both within and outside the settlement envelope and conservation area in the Mid Fife Local Plan. The elevated cliff area which is covered by woodland lies outside the settlement envelope and is designated as a Local Landscape Area. The woodland on the site is part of the Designed Landscape of Wemyss Castle and is identified as ancient semi-natural woodland. Development of the site would involve the removal of an area of ancient woodland.

74. Following my request for further information FIR 94, I am aware of the complicated planning history for the site which is not allocated for development in the Mid Fife Local Plan. Its allocation in the proposed plan reflects application 05/00047/COPP – planning permission in principle for residential/leisure/commercial tourist related development including harbour regeneration works, which was approved in 2010. The agents for the site have informed me that the council has now approved an application for matters specified in conditions for the erection of 42 dwellings, formation of vehicular access, car parking and roads including engineering works to reprofile and stabilise the cliff face (13/01684/ARC – approved on 3 June 2016). This approval includes the removal of an extensive area of ancient woodland.

75. The council’s reasoning behind the original 2010 decision and the newly approved application is that the removal of the unstable cliff is a significant public benefit for the village, the coastal path and the future restoration of the listed harbour master’s house. The officer committee report accepts that in isolation from the planning history of the site and the existence of the unstable cliff there would be no justification for the felling of this amount of ancient woodland. The development although not complying fully with the
development plan and other guidance is however considered to be acceptable on this basis. The proposal is considered an acceptable form of development at this point in time and permission is granted with the strict 2 year statutory commencement condition unchanged.

76. I acknowledge the significant protection afforded to ancient woodland in Scottish Government’s policy on “Control of Woodland Removal” and Scottish Planning Policy and the strong objections submitted by the Woodland Trust Scotland to the allocation of this site when the proposed plan was published and in response to further information request FIR 94. Both Scottish Natural Heritage and Forestry Commission Scotland have also responded to further information request FIR 94. However, while still having some concerns about the extent of woodland felling, neither have objected to the proposed plan allocation. Forestry Commission Scotland considers that the woodland removal associated with the cliff stabilisation will have significant public benefits. I must also take into account that circumstances have changed significantly since the proposed plan was published with the recent approval for housing development on the site. Taking all of the above into consideration and in particular the lack of objection from either Scottish Natural Heritage or Forestry Commission Scotland, despite the reservations expressed about the removal of ancient woodland, given the extenuating circumstances, I accept that it would not be reasonable to delete the site from the proposed plan.

77. Notwithstanding my findings above, I share the concerns expressed by the Woodland Trust Scotland, Scottish Natural Heritage and Forestry Commission Scotland with regard to the woodland felling proposed. Ancient woodland is a nationally recognised, irreplaceable resource and its removal must be fully justified. Contrary to the argument of the site promoter that this matter is no longer relevant for further consideration as part of the examination, I am satisfied that the presence of ancient woodland both within and adjacent to the site should be reflected in the wording of the proposed plan in the event that the current planning approval is not implemented. I do not, however, consider that reference to the need for a protective strip would, in this instance, be appropriate as the ancient woodland is located within the site boundary as well as adjacent to it.

78. I agree with the council that requirements should be added to the proposed plan to ensure that any development must stabilise the cliff face and secure the future of the listed building given their importance in justifying the development of the site. In addition, I accept that, for clarity, the reduced housing capacity for the site imposed through the recent approval (from 54 to 42 houses) should be reflected in the proposed plan and the approval should be referred to. Finally, I consider that as a result of the aspiration that the cliff face should be made more stable, the reference to “the geological interest in the cliff” is no longer necessary.

79. The green network priorities for the site state that biodiversity impacts should be considered in developing proposals for the site. In addition, Policy 13 (Natural Environment and Access) seeks to protect or enhance natural heritage assets including protected and priority species. It states that development proposals must provide an assessment of the potential impact on natural heritage and biodiversity. I am satisfied that the proposed plan already provides adequate protection for protected species, if present on this site, and do not consider that further additions to the proposed plan are required.

80. Subject to the above changes to the proposed plan wording, I conclude that the
The proposed plan is clear in providing an estimated capacity of 55 houses. The annual housing land audit provides details on the rate of progress and indicates the number of houses completed along with those remaining. On this basis, no change is necessary to the proposed plan.

This 4 hectare greenfield site is situated to the east of Windygates behind existing development along the A916. It is located outside the settlement envelope in the Mid Fife Local Plan. I accept that development on the site would be relatively well contained and would present a logical rounding off of the village to the east of the A916. I acknowledge that flooding issues and the matter of educational capacity may be able to be overcome and that the site has no access issues. Furthermore the site could be reasonably well connected to facilities in the village and by bus routes to other larger settlements in the area.

However, the 80 to 90 houses proposed would constitute a large extension to what is a modestly sized settlement. Two housing sites from the existing Mid Fife Local Plan are already identified in the proposed plan at Windygates for a total of 130 dwellings. Two new allocations are included at nearby Kennoway for a further 215 dwellings (plus an existing allocation of 66). I regard this level of development to be more than adequate for 2 settlements of this size over the plan period particularly when the strategy of the proposed plan for the Levenmouth area is for the Levenmouth Strategic Development Area to be the main focus of development. This Strategic Development Area is expected to provide 1,650 new homes together with supporting community facilities. Despite the reduction in the level of housing development proposed from previous submissions, I consider that the addition of this site for a further 80 to 90 houses would result in an unacceptable cumulative scale of development for both the village of Windygates and the area of Levenmouth outside the Strategic Development Area.

I deal with the Levenmouth Strategic Development Area at paragraphs 2 to 8 above. On my site inspection I noted that new educational facilities for the Levenmouth Campus of Fife College are now well under construction. I am also aware from information provided by the council in further information request FIR 03 that a Pre-Application Notice (PAN) was submitted in summer 2015 and early community consultation has begun. A formal request under Regulation 14 of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2011 for a formal Scoping Opinion from Fife Council on the scope of an environmental impact assessment has been submitted and an application is expected in 2016. A planning application for an internal road layout on part of the employment land has also been approved.

Although I have not been informed of a housing developer involved with the site, given the progress described above in progressing the site, I am not convinced that there is an over reliance on this site or that additional housing sites are required to augment the supply in the Levenmouth area. Indeed, the allocation of a further green
field site outwith the Strategic Development Area when combined with the others already
allocated in the immediate area could undermine its delivery and the provision of the
important infrastructure and community facilities associated with it, contrary to
paragraph 3.11 of the SESplan Supplementary Guidance (2014).

86. In conclusion, I recognise that the council’s 2015 Housing Land Audit identifies a
shortfall in the 5 year effective housing land supply for the SESplan area of Fife. I also
acknowledge the uncertainties expressed under Issue 2b (Homes) with regard to the
level of this shortfall. Regardless of the level of shortfall identified, I find that this site
would nevertheless be unacceptable because the adverse impacts identified above
would outweigh the benefits of addressing any shortfall. The submissions made about
the effectiveness/deliverability of this site, the detail of its design, its identification as a
reasonable alternative housing site by the council and the concerns about the
deliverability of other sites in the proposed plan do not alter my view.

Candidate site LDP-WDY 002 – Balcurvie Farm

87. This 8.5 hectare site is located outside the settlement envelope in the Mid Fife
Local Plan. The proposal would extend built development to the north of Windygates
beyond Fa Latch Road. It would further consolidate existing ribbon development along
the A916 and bring the main built-up area of the village considerably closer to
Kennoway. Intermittent views of the undulating greenfield site, which sits behind the row
of houses beyond the Fa Latch Road junction, currently provide a sense of separation
between the main built-up areas of Windygates and Kennoway. The proposed stand-off
distances and landscaping areas to the north of the site would not prevent this sense of
separation being partially lost. The agricultural fields which make up the site are divided
into various small-holdings and used for grazing horses. This provides a distinct rural
landscape setting for the northern edge of Windygates with Fa Latch Road as an easily
identifiable boundary which clearly separates it from Kennoway. The proposed
development would result in both an adverse impact on this rural landscape setting and
increase the potential for a perceived coalescence with Kennoway.

88. I noted on my site inspection, the poor condition of the unadopted Fa Latch Road
and the problems with access onto the busy A916. I agree that further intensification of
its use to access additional housing is unlikely to be possible particularly due to
problems of visibility at this junction. I acknowledge the alternative access arrangements
now proposed further north along the A916. However, I must also take into account the
comments of the council’s transport section that multiple access points would be
required for a site of this size and their assessment that there are no other suitable
access points available. Given my experience on the site inspection together with the
council’s comments I am not convinced that acceptable access arrangements would be
achievable.

89. Furthermore, the 180 houses proposed would constitute a large extension to what
is a modestly sized settlement. Two housing sites from the existing Mid Fife Local Plan
are already identified in the proposed plan at Windygates for a total of 130 dwellings.
Two new allocations are included at nearby Kennoway for a further 215 dwellings (plus
an existing allocation of 66). I regard this level of development as more than adequate
for 2 settlements of this size over the plan period particularly when the strategy of the
proposed plan for the Levenmouth area is for the Levenmouth Strategic Development
Area to be the main focus of development. This Strategic Development Area is
expected to provide 1,650 new homes together with supporting community facilities.
90. I consider that the addition of the proposed site for up to 180 houses would result in an unacceptable cumulative scale of development for both the village of Windygates and the area of Levenmouth outside the Strategic Development Area. The arguments advanced about the effectiveness/delivery of the Strategic Development Areas do not alter my view. I am not persuaded that there is an over reliance on the Strategic Development Areas or that additional housing sites over and above the considerable supply already allocated are required to augment the housing supply in the Levenmouth area and provide further range and choice. Indeed, the allocation of a further green field site outwith the nearby Levenmouth Strategic Development Area, when combined with the others already allocated in the immediate area, could undermine its delivery and the provision of the important infrastructure and community facilities associated with it, contrary to paragraph 3.11 of the SESplan Supplementary Guidance (2014).

91. In conclusion, I recognise that the council’s 2015 Housing Land Audit identifies a shortfall in the 5 year effective housing land supply for the SESplan area of Fife. I also acknowledge the uncertainties expressed under Issue 2b (Homes) with regard to the level of this shortfall. Regardless of the level of shortfall identified, I find that this site would nevertheless be unacceptable because the adverse impacts identified above would outweigh the benefits of addressing any shortfall. The submissions made about the accessibility of the site to local services, its effectiveness/deliverability, the availability of suitable infrastructure to accommodate the development and the lack of flooding or natural/cultural heritage constraints to development do not alter my view.

**Reporter’s recommendations:**

I recommend that the following modifications be made:

1. On page 132 of the proposed plan, under development requirements for site LVA 001, Sea Road, Muiredge, Percival Road insert the following new bullet after CHP/Renewable provision:

   “Consideration of the impact of the Diageo distillery on the amenity of proposed housing development on the site.”

2. On page 132 of the proposed plan, under development requirements for site LVA 001, Sea Road, Muiredge, Percival Road insert the following new paragraph:

   “The Levenmouth Link Road project (LVA 002) proposes road enhancements to make Lower Methil, the waterfront area and Energy Park Fife more accessible, and passes through the Strategic Development Area. The line of the road through the Levenmouth Strategic development area is indicative only – the final route will be determined through the masterplanning process. The impacts of the road improvements on the community garden at Starkies Wood and the common good park adjoining the High School will be minimised and/or mitigated.”

3. On page 133 of the proposed plan under development requirements for site LVA 002, Levenmouth Link Road insert the following before the final sentence of the first paragraph:

   “The impacts of the road improvements on the community garden at Starkies Wood and the common good park adjoining the High School will be minimised and/or
mitigated.”

4. On page 129 of the proposed plan under development requirements for site MET 005, Methil Docks Business Park – Land north of Bayview Football Stadium and on page 130 under development requirements for site MET 009, Energy Park Fife – Barclay Brothers site insert the following:

“The Levenmouth Link Road project (LVA 002) proposes road enhancements to make Lower Methil, the waterfront area and Energy Park Fife more accessible.”

5. Amend the indicative route of the Levenmouth Link Road (LVA 002) on all of the relevant maps accompanying the local development plan as shown in further information request FIR 44.

6. On page 45 of the proposed plan under development requirements for site CLW 002, Land south of Coaltown of Wemyss replace the final bullet point with the following:

“Account must be taken of the ancient woodland adjacent to the site. It is likely that a protective strip will be required, the extent of which should be determined following a detailed survey.”

7. On page 136 of the proposed plan under development requirements for site KEN 002, Land between Halffields Gardens and Leven Road remove reference to “woodland” from bullet 2 and add the following new bullet:

“Account must be taken of the ancient woodland adjacent to the site. It is likely that a protective strip will be required, the extent of which should be determined following a detailed survey.”

8. On page 136 of the proposed plan under development requirements for site KEN 004, Langside Crescent amend the estimated site capacity (housing) to read 5.

9. On pages 127 and 128 of the proposed plan, add the following to the development requirements for LEV 005, Thornton to Leven and Thornton to Westfield rail lines and LEV 008, Bawbee Bridge, Leven:

“There is currently no commitment or approval for this proposal from Transport Scotland. Further discussions between the council and Transport Scotland will take place.”

10. On page 129 of the proposed plan, under development requirements for site MET 006, Methil Docks Business Park – Ajax Way, identify the site as suitable for use classes 4, 5 and 6.

11. On page 130 of the proposed plan, under development requirements for site MET 009, Energy Park Fife – Barclay Brothers site, identify the site as suitable for use classes 4, 5 and 6.

12. On page 130 of the proposed plan, under development requirements for site MET 010, Energy Park Fife, identify the site as suitable for use classes 4, 5 and 6 (energy). (See also modification 14 below)
13. On page 130 of the proposed plan under development requirements for site MET 008, West of Thornton House insert the following:

   “A flood risk assessment is required. Design of development must take account of the findings of the flood risk assessment.”

14. On page 130 of the proposed plan delete site MET 010, Energy Park Fife and insert as site BKN 003 on page 128 of the proposed plan under the settlement plan for Buckhaven. Carry out any consequential amendments to the proposals map and text of the plan. (See also modification 12 above).

15. On page 131 of the proposed plan under development requirements for site MET 011, Methil Power Station amend the second sentence as follows:

   “A design framework/master-plan should be produced to provide detailed design guidance for development within this area and should take into account the recommendations from the Bawbee Bridge design led consultation charrette in 2013.”

16. On page 181 of the proposed plan, under site WWS 001, Wemyss Estate Land at West Wemyss:

   (a) Amend the estimated capacity (housing) to read 42 instead of 54.

   (b) Add the following to the “Status, additional development requirements and other information”:

   “Application 13/01684/ARC (approval of matters specified in conditions) for the erection of 42 dwellings, formation of vehicular access, car parking and roads including engineering works to reprofile and stabilise the cliff face was approved on 3 June 2016.”

   (c) Add the following to the “Status, additional development requirements and other information”:

   “Any development on this site must stabilise the cliff face and secure the future of the B listed Shorehead house.”

   (d) Delete reference to “the geological interest of the cliffs” from the green network priorities.

   (e) Add the following sentences to the green network priorities:

   “Account must be taken of the ancient semi-natural woodland within and adjacent to the site. There is a national presumption in favour of protecting ancient woodland.”
<table>
<thead>
<tr>
<th>Issue 15a</th>
<th>East Neuk Area</th>
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<tbody>
<tr>
<td><strong>Development plan reference:</strong></td>
<td>Settlement Plans: Anstruther and Cellardyke (pages 22-23), Colinsburgh (page 46), Lower Largo (page 143), Pittenweem (page 152), St Monans (pages 171-172), Countryside Proposal LWD 024 (page 187), Countryside Area</td>
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<tr>
<td><strong>Reporters:</strong></td>
<td>Dilwyn Thomas</td>
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**Body or person(s) submitting a representation raising the issue (including reference number):**

**ANSTRUTHER AND CELLARDYKE**
- CWP (2049)
- ANS 001 Cellardyke Caravan Park
- NHS Fife (3834)
- ANS 003 Bankwell Road
- SEPA (3303)
- ANS 005 St Andrews Road extension
- SEPA (3304)
- ANS 006 Adjacent to fire station
- C Russell Paton (2460)

**COLINSBURGH**
- Colinsburgh & Kilconquhar Community Council (3907)
- COB 001 South East of Village
- Colinsburgh & Kilconquhar Community Council (156)
- Lord Balnies Trust for Children (1298)
- COB 002 South Wynd Depot
- Colinsburgh & Kilconquhar Community Council (157)
- Lord Balnies Trust for Children (1299)
- COB 003 Main Street
- Colinsburgh & Kilconquhar Community

**LOWER LARGO**
- LLA 001 (East of Durham Wynd)
- Ian Fowler (1409)
- Joanne Fowler (1437)
- Elizabeth Rolland (1656)
- Stephen Wood (2027)

**PITTENWEEM**
- Cllr Elizabeth Riches (3928)
- Pittenweem Community Council (3929)
- Cllr Donald Macgregor (3930)
- Cllr John Docherty (3931)

**PIT 001: St Margaret’s Farm**
- John Handley Associates Ltd (511)

**ST MONANS**
- St Monans Allotments Association (352)
- STM 001 West of Manse (Housing) & STM 003 West of Manse (Allotments)

- St Monans Allotments Association (351)
- St Monans & Abercrombie Community Council (680) (682)
- J Thomson (1023, 1033, 1044)
- Muir Homes Ltd (1354, 1938)
- Stuart Tarvit (2273)
- SEPA (3643)

- STM 004 Cemetery, St Monans Church
- SEPA (3644)
COUNTRYSIDE AREA
Lundin Homes (3918)
LWD 024: Carnbee Cemetery
SEPA (3267)

Provision of the development plan to which the issue relates:
Settlement Plans (East Neuk): Anstruther, Colinsburgh, Lower Largo, Pittenweem, St Monans, Countryside Area

Planning authority’s summary of the representation(s):

ANSTRUTHER AND CELLARDYKE

ANS 001 Cellardyke Caravan Park

NHS Fife (3834): Additional 331 houses currently under construction plus potential 28 from other developments in the Anstruther and Cellardyke area could impact on healthcare services. It would be of benefit for discussions with NHS Fife to be arranged to confirm status of local GP and other healthcare services.

ANS 003 Bankwell Road

SEPA (3303): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken.

ANS 005 St Andrews Road extension

SEPA (3304): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken.

ANS 006 Adjacent to fire station

C Russell Paton (2460): There is a Right of Way/Access to this area of ground at the foot of the main gardens area of Mayview House, through our gate on the South/South East wall. Object to any proposal that restricts this, or would create a hidden or unseen dark corner. The proposal for Lock Ups/Small Workshops, or the like, could create such an area to the detriment of the housing, children families and the area generally. A more realistic proposal would be for car parking and access to the Fire Station and White Gables. I have the ownership, by title, of this ground and therefore the plan proposals are out of order. I will be submitting my own plans for this particular area of ground in due course.

Anstruther and Cellardyke – Non-inclusion of sites

CWP (2049): CWP seeks allocation of land to the north of Crail Road as a ‘Housing Development Opportunity’ with capacity for approximately 240 units with potential as a location for convenience retail development. There is significant doubt as to whether the LDP strategy for meeting the housing land requirement is robust and achievable.
Additional new housing sites needs to be identified.

Anstruther is identified within TAYplan as a principal settlement. The land to the north of Crail Road offers a logical and sustainable settlement expansion and would round off the settlement. Site has good access and can be considered effective. Dispute the Site Assessment conclusion that development of the site would have a ‘significant landscape impact’. The site is not subject to a ‘local landscape area’ designation and bounded on three sides by residential properties.

There is an urgent need to accommodate new convenience retail floorspace within the East Neuk area to address the continued leakage of expenditure being experienced. Site suitable for retail provision, given Anstruther’s status within TAYplan, and the lack of any obvious site opportunities either within, or on-the-edge of Anstruther Town Centre to accommodate the scale of new floorspace required to address the existing deficiencies in provision.

COLINSBURG

Colinsburgh Issues

Colinsburgh & Kilconquhar Community Council (3907): The Community Council supports the local development plan proposals and development requirements proposed for Colinsburgh. At our community council meeting (November 2014) all three proposed sites gained the full support of the community. The view of the local community is that the village needs to grow to support the local school, shops and local amenities. We encourage the further expansion of the Colinsburgh Settlement and would request that further additional sites be considered in the future.

COB 001 South East of Village

Colinsburgh & Kilconquhar Community Council (156): Support the inclusion of this site in the Local Development Plan. Following a recent meeting with Balcarres Estate, the Community Council supports the request submitted by Balcarres Estate to include additional land (COB001/B - highlighted in red on an attached map) to allow another access road to the new development site COB001 helping to reduce local traffic pressures, and to allow the stone dyke wall to be continued along the south side of the village. The Community Council understands that this extra area would provide a recreational/grass area for the residents of the village where there would be picnic benches, a nature walk, children's area, fruit trees and a wetland area, and potentially a growing area for the school. The land is non-farmable due to its size and shape. This is a great example of a local land owner listening to its local community and working together.

The Community Council is pleased to learn that Balcarres Estate is looking at making a provision for a new Smiddy to be built within COB001 to accommodate the future expansion of the village school at COB003.

Lord Balnies Trust for Children (1298): Whilst we support the continuation of this allocation, we seek the inclusion of an additional area of land to the south to provide for an alternative vehicular link between Main Street and South Wynd to resolve a current problem junction. The Estate have commissioned the attached Indicative Masterplan in discussion with the Community Council sets out the rationale for including this area. The
additional land would result in COB 001 measuring 5.7ha. The masterplanning process has identified a slight increase in the number of houses from 40 houses to 43 houses.

The Estate is committed to providing attractive open space on the southern edge which will enhance the quality of village life and create an attractive setting to Colinsburgh. A swathe of open space will protect the setting/amenity of the listed property (Mayfield). The proposed open space area would be designed in association with the community. The proposals use a defined and historic field boundary which is supported by the natural topography; reinforced by new walling and planting including field trees and a hedgerow.

COB 001 as currently shown measures 3.7ha not 2.4ha and this should be changed regardless of the allocation of additional land.

COB 002 South Wynd Depot

Lord Balniel's Trust for Children (1299): Support the continuation of this site to the new Local Development Plan. The owner has aspirations for the site as a possible "live/work" development of 5 units, within the context of a wider masterplan for Colinsburgh.

Colinsburgh & Kilconquhar Community Council (157): Support the inclusion of this site in the Local Development Plan.

COB 003 Main Street

Colinsburgh & Kilconquhar Community Council (158): Support the inclusion of this site in the Local Development Plan.

Colinsburgh & Kilconquhar Community Council (158): The Community Council is pleased to learn that Balcarres Estate is looking at making a provision for a new Smiddy to be built within COB001 to accommodate the future expansion of the village school at COB003.

KILCONQUHAR

Colinsburgh & Kilconquhar Community Council (515): Concern that the proposed village outline cuts through the middle of garden at 41 Main Street, Kilconquhar. Request that the area shaded in red (on a plan attached to the comment submission) is included within the settlement boundary, reflecting how it was in a previous version of the Local Plan (submission also includes a map showing the St Andrews & East Fife Draft Local Plan map, from 2005). Consider it makes logical sense for the village line to follow the existing fence line as opposed to cutting through the middle of the garden. Planning Permission was granted earlier this year for an Out Building / Summer House to be built on the very area of land which is being requested to be included / reinstated within the village outline.

Lundin Homes (3919): Object to the non-inclusion of two sites at Kilconquhar for housing (see maps attached to comments displaying site boundaries). The sites are considered fully effective in terms of the criteria set out under PAN 2/2010. The comments consider that there is likely to be a shortfall in providing an effective supply of housing, and that the sites proposed offer significant potential in meeting the TAYplan requirement. The sites should be considered as an alternative to the Doves Loan site in Ceres, which
should be removed from the plan as it is ineffective.

**LOWER LARGO**

**LLA 001 (East of Durham Wynd)**

Ian Fowler (1409), Joanne Fowler (1437): Object to the proposal. The site seems to have been amended to include land up to the A915 without consultation. This will change the structure and shape of Lower Largo through ribbon development along the A915, leading to coalescence with Upper Largo. No letters have been sent to people living close to the site to inform them of changes to the plan. 61 houses is a significant increase of the number of houses in Lower Largo.

A petition of 269 people was submitted to Fife Council in June 2010 against the development. The democratically elected Levenmouth Committee and Planning Committee did not give permission for more than 20 houses at Durham Wynd.

There is an intermediate pressure gas pipe within the field that could cause safety issues for the residents of Lower Largo. The new development does not provide any improvement to the present sewage and water provisions which were highlighted by Fife Council as needing improvement.

The site is prime agricultural land.

Ian Fowler (1409), Joanne Fowler (1437), Stephen Wood (2027): Further housing will stretch road capacity and safety. Junctions from Durham Wynd onto the A915, and between Bourtree Brae and Durham Wynd are dangerous, and not suitable for an additional 60 houses.

Elizabeth Rolland (1656): This site lies directly in front of a historic ruin of the Adam House, 'Largo House' and its landscaped park. Any development should be carefully and cleverly designed to reflect this unique characteristic. The detailed planning must be controlled by Fife Council to produce an attractive development sensitive to the location.

Stephen Wood (2027): Object to any further extension of housing between Lower Largo and the Serpentine Walk. There is strong local resistance to any further housing. It will be at the cost of the natural beauty of the area and its amenity value to the inhabitants of the villages of Upper Largo, Lower Largo and Lundin Links. The distinct character of the villages as separate entities will be adversely affected by further development.

**PITTENWEEM**

**PIT 001: St Margaret's Farm**

John Handley Associates Ltd (511): Support the retention of this existing Local Plan proposal within the new Local Development Plan, on behalf of the consortium of landowners and developers of this site. Detailed proposals are currently being progressed for the development of the St Margaret's Farm site, with a planning application anticipated to be submitted in 2015.
Pittenweem - Non-inclusion of sites

Cllr Elizabeth Riches (3928), Pittenweem Community Council (3929), Cllr Donald Macgregor (3930), Cllr John Docherty (3931): Pittenweem Community Council and Local Elected Members recommend that Candidate site: LDP-PIT001 ‘Maw Dubs and Ninian Fields’ be allocated for housing

ST MONANS

STM 001 West of Manse (Housing) & STM 003 West of Manse (Allotments)

Housing (STM 001)

J Thomson (1023), Muir Homes Ltd (1354): Support identification of STM 001. Muir Homes Ltd has the first phase of the site under option from the land owner with a view to progressing with a planning application early in 2015. A Proposal of Application Notice has been served on Fife Council and on the local Community Council, with whom early dialogue on the form of the development has commenced.

J Thomson (1023 & 1044), Muir Homes Ltd (1354): Object to the requirement in STM001 for development to be in accordance with the Indicative Development Framework. The examination report for the adopted St Andrews & East Fife Local Plan (Core Document, CD22) page 509 stated that the Reporter would ‘be prepared to accept that the Council should prepare the framework on the basis that it would be indicative and not binding insofar as any subsequent planning application was concerned’. The prescriptive nature of the Indicative Development Framework (IDF) and the FIFEplan proposal wording reduces flexibility and the ability to achieve the most appropriate and deliverable development form for the benefit of St Monans. There will be an opportunity to re-consult the community and address the unresolved objections to the IDF in a full planning application. The IDF requires the delivery of off-site connections and landscape provision which impact on third party land. The implications for the present or any future developer being unable to deliver these “indicative” requirements is unclear. Concern that land ownership may create a ransom position. The IDF document should be removed from the Plan.

Muir Homes Ltd (1354): The justification for many of the Framework requirements is unclear. There needs to be a degree of flexibility in order to allow a full assessment of all practical issues related to the site, its infrastructure and the most appropriate development form, for example, the location of allotments. It is important that unnecessary obstacles/restrictions are not placed on beneficial development as this clearly does not assist the delivery of required housing and other facilities supporting local communities. The approach at St Monans differs from the vast majority of sites in the Local Plan/Local Development Plan. LDP policy requirements related to design quality would be sufficient to deliver the content and quality of development required.

St Monans and Abercrombie Community Council (680, 682): Object to a vehicular access to Queen Margaret Street, on the basis this would accentuate traffic issues in the area. A footpath link would be sufficient. A local police representative has advised that traffic calming measures would be required to control speeding issues, accentuating existing congestion problem caused by parked cars. There is concern about the introduction of a road close to the play park. Question whether the play park could be moved west, due to the location of the proposed new link road to the Fire Station.
Vehicular access for the proposed allotment site could be taken off the new housing development.

Support for a link road between the Fire Station and the new development to enable access for the Fire tender directly out of the village, if restricted to emergency one way access out of the village for the Fire service use only.

Stuart Tarvit (2273): The road leading from the fire station needs to be considered as if the fire station went in future that would leave the road a free for all.

J Thomson (1023): Object to proposed vehicular through links. Designing Streets and Scottish Planning Policy do not encourage vehicular linkages between existing and new development but promote place before movement, reducing the dominance of vehicular traffic, and encouraging walkable neighbourhoods with good public transport links. The through routes proposed are unnecessary and will have a detrimental impact on the existing sense of place and residential amenity of existing occupants. A connected place can be achieved through pedestrian and cycle links. Proposals do not take on board previous consultation on this issue. Willing to allow the Fire Service to link to our site.

Object to requirement to provide a 3 metre wide section of the national cycle network (NCN76) on the northern edge of the site. NCN76 does not currently run along the A917, is remote from the development and not directly related to it.

SEPA (3643): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken. Support the inclusion of a Site Requirement for a buffer strip along the watercourse as this measure will help protect and improve the water environment. Support the inclusion of the requirement to consider through a feasibility study, the potential for restoration and improvement of the water environment through the site design.

Allotments (STM 003)

St Monans Allotments Association (351, 352): We endorse the plans outlined in the St Monans Indicative Development Framework. We remain keen to work in partnership with Fife Council and other groups to make allotments in St. Monans a success and believe this type of community asset has health, social, and environmental benefits. Demand has been identified with 28 people on a waiting list held by Fife Council Parks and Countryside who will lead the development of the site. Fife Council Development Services have explored all other locations in the area for allotments and have concluded this is the most suitable site. A community survey by St Monans Community Council in 2009 showed 75% support from residents for allotments in St. Monans.

St Monans and Abercrombie Community Council (680, 682): If Allotments are to be included, these should be located to the South East corner of the field, away from the main road. Consideration should be given to stronger screening, perhaps utilising the proposed Community Orchard as a boundary. Based on understanding that the Allotments Association would consider/favour, fewer and smaller plot sizes it is requested that consideration for other uses, including a play park, be given to part if not all of this area. The extension of the existing playpark to the North should be given to form a stronger link between the existing village and the new development.
J Thomson (1033): Object to the STM 003 Allotment allocation. Whilst we accept that a site assessment process has been undertaken and this is the location that the allotments will be delivered, there seems to be some uncertainty as to the scale of provision required. Further information should be requested on this point to identify the precise level of provision necessary.

Muir Homes Ltd (1938): The precise location of the allotments should be determined through a planning application rather than through prescriptive positioning in the LDP. STM003 should be contained within the boundary of site STM001 rather than specifically allocated within the Indicative Development Framework.

Stuart Tarvit (2273): There are better sites for the allotments that have been overlooked i.e. The Common would be a better option as it belongs to the town, would allow more room, and is close to the school and nursery which the allotment team want to draw on. There is also the sea side site.

STM 004 Cemetery, St Monans Church

SEPA (3644): Support the inclusion of a Site Requirement for a buffer strip along the watercourse as this measure will help protect and improve the water environment. Support the inclusion of the requirement to consider through a feasibility study, the potential for restoration and improvement of the water environment through the site design.

COUNTRYSIDE AREA

LWD 024: Carnbee Cemetery

SEPA (3267): Seek a change that a Flood Risk Assessment (FRA) be included as a site specific developer requirement. This site is located in or adjacent to the functional flood plain or an area of known flood risk. There is a small watercourse to east of site which may pose a small flood risk. As such, part of the site may not be suitable for development.

Sites (not in the Proposed FIFEplan) proposed by objectors

Lundin Homes (3918): Object to the non-inclusion of candidate site LDP-LWD014 ‘Greenside, near Montrave’ for an experimental energy efficiency testing and demonstration project. Proposals for the site involve the creation of an energy efficient solar housing testing and demonstration project which are being prepared in collaboration with Abertay University.

For the prototype to work at the optimum level there cannot be shading from adjacent buildings and this would result in the loss of 4 standard housing plots for each prototype build. This is a significant financial burden for a small house builder paying standard residential rates per plot. Building within an extended plot arrangement with dwellings which are completely different in terms of architectural style and finishings would be inconsistent with the principles of Designing Streets and would be unlikely to gain planning permission. In addition, there is no guarantee that a prototype product could be sold at a price that would justify the investment on a standard market site.
### Modifications sought by those submitting representations:

#### ANSTRUTHER AND CELLARDYKE

**ANS 001 Cellardyke Caravan Park, ANS 003 Bankwell Road and ANS 005 St Andrews Road extension**

NHS Fife (3834), Scottish Environment Protection Agency (3303) and Scottish Environment Protection Agency (3304): none stated.

**ANS 006 Adjacent to fire station**

C Russell Paton (2460): Delete or amend proposal ANS 006.

**Anstruther and Cellardyke – Non-inclusion of sites**

CWP (2049): Allocate land to the north of Crail Road as a ‘Housing Development Opportunity’ for approximately 240 units and potential for convenience retail development.

#### COLINSBURGH

**Colinsburgh Issues**

Colinsburgh & Kilconquhar Community Council (3907): Encourages the further expansion of the Colinsburgh Settlement and requests that further additional sites be considered in the future.

**COB 001 South East of Village**

Colinsburgh & Kilconquhar Community Council (156), Lord Balniel's Trust for Children (1298): Allocate additional land south of COB 001.

Lord Balniel's Trust for Children (1298): COB 001 Amend site area to accurately reflect allocated land.

**COB 002 South Wynd Depot and COB 003 Main Street**

Lord Balniel's Trust for Children (1299) and Colinsburgh & Kilconquhar Community Council (157 & 158): none stated.

#### KILCONQUHAR

**Colinsburgh & Kilconquhar Community Council (515): Request an amendment to the settlement boundary.**

Lundin Homes (3919): Request inclusion of two sites at Kilconquhar for housing.
LOWER LARGO

LLA 001 (East of Durham Wynd)

Ian Fowler (1409) and Joanne Fowler (1437):

- Delete proposal LLA 001.
- Remove land up to the A915.

Elizabeth Rolland (1656): none stated.

Stephen Wood (2027): Delete any further extension of housing between Lower Largo and the Serpentine Walk.

PITTENWEEM

PIT 001: St Margaret’s Farm


Pittenweem - Non-inclusion of sites

Cllr Elizabeth Riches (3928), Pittenweem Community Council (3929), Cllr Donald Macgregor (3930), Cllr John Docherty (3931): Allocate Candidate site: LDP-PIT001 ‘Maw Dubs and Ninian Fields’ for housing

ST MONANS

STM 001 West of Manse (Housing) & STM 003 West of Manse (Allotments)

Housing (STM 001)

J Thomson (1023 & 1044), Muir Homes Ltd (1354):

- Delete the requirement in STM001 for development to be in accordance with the Indicative Development Framework.
- The Indicative Development Framework document should be removed from the Plan.

St Monans and Abercrombie Community Council (680 & 682) and J Thomson (1023): Amend Indicative Development Framework to remove proposed vehicular access to Queen Margaret Street.

J Thomson (1023): Delete the requirement in STM 001 to provide a 3 metre wide section of the national cycle network (NCN76) on the northern edge of the site.

SEPA (3643): none stated.
Allotments (STM 003)

St Monans and Abercrombie Community Council (680 & 682):

- If allotments are to be included, these should be located to the South East corner of the field, away from the main road.
- Consideration should be given to stronger screening of allotments, perhaps utilising the proposed Community Orchard as a boundary.
- If the allotment area is reduced in size, consideration should be given to provision of other uses, including a play park, for part if not all of this area. The extension of the existing playpark to the North would form a stronger link between the existing village and the new development.

J Thomson (1033): Reconsider the scale of allotment provision required.

Muir Homes Ltd (1938): Remove specific site boundary for STM 003 and show as indicative location within the boundary of site STM001.

Stuart Tarvit (2273): Relocate proposed allotments to an alternative site i.e. The Common or the sea side site.

STM 004 Cemetery, St Monans Church

SEPA (3644): none stated.

COUNTRYSIDE AREA

LWD 024: Carnbee Cemetery

SEPA (3267): Add a developer requirement for a Flood Risk Assessment (FRA) to be undertaken.

Sites (not in the Proposed FIFEplan) proposed by objectors

Lundin Homes (3918): Request inclusion of candidate site LDP-LWD014 ‘Greenside, near Montrave’ for an experimental energy efficiency testing and demonstration project.

Summary of responses (including reasons) by planning authority:

ANSTRUTHER AND CELLARDYKE

ANS 001 Cellardyke Caravan Park

NHS Fife (3834): Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision.
ANS 003 Bankwell Road and ANS 005 St Andrews Road extension

SEPA (3303 & 3304): Support for Proposed FIFEplan position noted.

ANS 006 Adjacent to fire station

C Russell Paton (2460): Whilst Mr Russell claims ownership of this land, the site is in the ownership of Fife Council. Mr Russell is, however, one of two parties who have prescriptive rights of access over the site. Any development of the site would require to take these prescriptive rights into account. The potential uses proposed in the plan (lock-ups or small Class 4 business workshops) are considered to be compatible with adjoining uses. The site is located near to the centre of Anstruther, and could provide an opportunity for locally based companies. It is noted that lock-ups may not necessarily fall within employment use classes, and there may there be merit in amending the proposal description from ‘Employment’ to ‘Development Opportunity’. Fife Council invites the Reporter to make an appropriate recommendation on this issue.

Anstruther and Cellardyke – Non-inclusion of sites

CWP (2049): It remains Fife Council’s position that land to the north of Crail Road should not be allocated for development at this time. Whilst Anstruther is a Tier 3 TAYplan settlement, sufficient land is already allocated in both Anstruther and the East Neuk Settlements. The East Neuk Community Action Plan will inform longer term growth strategies for the area.

The site is not within a Local Landscape Area but the land provides part of the landscape setting of both Cellardyke and also Kilrenny to the east. The site is part of a flat, open landscape. It is therefore considered appropriate to highlight a potential significant landscape impact in the site assessment.

Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with under the Homes Schedule 4 (Issue 2B) and its associated supporting paper.

The Fife Retail Capacity Study 2014 (Core Document 40) concludes that in terms of convenience expenditure capacity, there is no requirement for additional convenience goods floorspace across the study period in East Fife. The Local Development Plan aims to promote town centres first. Higher levels of leakage are to be expected in East Fife and the East Neuk in particular due to its scattered settlement pattern and small population.

COLINSBURGH

Colinsburgh Issues

Colinsburgh & Kilconquhar Community Council (3907): Support noted. The sites identified in Colinsburgh in the Proposed Plan are considered to provide an appropriate level of growth for the settlement within the Local Development Plan period. The potential for further expansion will be considered both through the East Neuk Community Action Plan and future Local Development Plans.

NOTE: See also response to COB 001 with regard to a proposed amendment to the
boundary of land allocated to the south east of the village.

**COB 001 South East of Village**

Colinsburgh & Kilconquhar Community Council (156) and Lord Balnief's Trust for Children (1298): This site has been carried forward from the adopted St Andrews & East Fife Local Plan (2012). Land previously identified as coming forward after 2018 has been incorporated into a single site proposal.

The site promoter has proposed an extension to existing allocated land to the south to provide for an additional road access and greenspace. An Indicative Masterplan has been submitted in support of the proposals. This shows that the level of housing proposed would remain of a scale (43 houses) consistent with the allocation in the Proposed Local Development (40 houses). The proposals are supported by Colinsburgh & Kilconquhar Community Council.

There is considered to be merit in extending the site boundary of proposal COB 001 to the south as identified in the submissions from Colinsburgh & Kilconquhar Community Council and Lord Balnief's Trust for Children in order to allow improved access to and through the site, provide additional greenspace, and to allow visual improvements on the approach to the village from the south, and the Reporter is invited to make an appropriate recommendation on this matter.

Should an amendment to the site boundary be considered favourably, it may be appropriate to introduce green network priorities for the site as follows:

- Establish a high quality landscape edge along the eastern and southern boundaries to incorporate new habitat and SUDS provision and to include native planting and wildflower grassland adjacent to the farmland.
- Extend the existing Mayfield Terrace play area adjacent to the site to provide an area of kick about space, and provide high quality development edges overlooking the play area.
- Provide high quality development edges to Main Street and Mayfield Terrace.

Subsequent amendments to the green network opportunity mapping would also be necessary in the event of identifying green network priorities.

The site promoter has correctly identified that the site area identified against Proposal COB 001 does not reflect either the boundary in the Proposed Local Development Plan or that put forward by the site promoter. A factual amendment to reflect the finalised boundary is therefore supported by Fife Council.

**COB 002 South Wynd Depot and COB 003 Main Street**

Lord Balnief's Trust for Children (1299) and Colinsburgh & Kilconquhar Community Council (157 & 158): Support for the Proposed FIFEplan position is noted.

**KILCONQUHAR**

Colinsburgh & Kilconquhar Community Council (515): The settlement boundary for Kilconquhar in the Proposed Local Development Plan is unchanged from that in the adopted St Andrews and East Fife Local Plan (2012). Comments from Colinsburgh &
Kilconquhar Community Council have highlighted that the settlement boundary cuts through the middle of a garden at 41 Main Street and have recommended an amendment to the boundary. Taking on board this comment a factual amendment to the settlement boundary is supported by Fife Council.

Lundin Homes (3919): The two sites that Lundin Homes seeks to have allocated were not considered through the candidate site process for residential development and so have not been the subject of site assessments for inclusion in the Proposed Local Development Plan and have not been subject to public consultation.

The site north of Greenbrig Road includes land allocated as protected open space. The other site lies within the open land that sits between the main part of Kilconquhar and Barnyards. The area forms part of the landscape setting and forms part of a Local Landscape Area identified in the plan. Fife Council considers that neither site should be allocated for housing in the Local Development Plan.

The Proposed Local Development Plan allocates land for housing across the St Andrews and North East Fife Housing Market Area, sufficient to meet statutory requirements. The Proposed Plan includes sufficient allocations in the surrounding East Neuk area to meet more local demands. Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with under Issue 2B – Homes.

Comments relating to Ceres are addressed in Issue 17 ‘Cupar Area’.

LOWER LARGO

LLA 001 (East of Durham Wynd)

Ian Fowler (1409), Joanne Fowler (1437), Elizabeth Rolland (1656), Stephen Wood (2027):

This site has been carried forward from the adopted St Andrews & East Fife Local Plan (2012). The site boundary and capacity of the site remain unchanged.

A planning application for the site (ref: 14/04211/FULL) for 61 houses is currently being considered for this site by Fife Council.

The site was considered through the examination of the adopted Local Plan. This considered issues relating to scale of development, environmental, built heritage and landscape impacts, settlement coalescence, sewage and water issues, loss of prime agricultural land, and traffic concerns.

The reporter, in relation to the above issues found that:

- the scale of development would be unlikely to result in any significant impact visually or in social terms.
- the extension of the village would be reasonable in terms of landscape character and the setting of Lower Largo and Upper Largo.
- the use of some prime agricultural land will be required to achieve the housing target in the settlement strategy.
• the development of the site would have no direct or indirect adverse impact on any formal landscape designations or the village setting.
• development would not be likely to have a significant adverse impact on any nature conservation interests.
• the character of both the Category B listed Largo House and its setting would remain unaffected.
• no fundamental transportation or infrastructure shortcomings have been identified that would require removal of the site.

With regard to the presence of an intermediate pressure gas pipe within the field, the Health and Safety Executive has not raised any issues regarding this site, and it is considered that this can be addressed at the planning application stage.

The Proposed Local Development Plan includes an illustration ‘East of Durham Wynd – Site Features’ which shows the site in its context, including land up to the A915 road. Fife Council considers that there may be merit in amending this illustration to make the site boundary clear (i.e. to clarify that land adjacent to the A915 is not allocated for development) in response to comments made and invites the Reporter to make an appropriate recommendation on this matter.

Comments relating to the consultation process are addressed in the Statement of Conformity (Core Document CD45).

PITTENWEEM

PIT 001: St Margaret’s Farm


Pittenweem - Non-inclusion of sites

Cllr Elizabeth Riches (3928), Pittenweem Community Council (3929), Cllr Donald Macgregor (3930), Cllr John Docherty (3931): Fife Council is encouraged that representatives of the local community are proactive about providing new housing in Pittenweem, and is happy to work with the community council to see proposals for Pittenweem taken forward through the East Neuk Community Action Plan process. Candidate site LDP-PIT001 ‘Maw Dubs and Ninian Fields’ is not identified in the Proposed Local Development Plan due to limited potential for integration with Pittenweem, landscape impact, and because sufficient land for housing is already allocated within the local area at this time.

ST MONANS

STM 001 West of Manse (Housing) & STM 003 West of Manse (Allotments)

Housing (STM 001)

J Thomson (1023 & 1044), Muir Homes Ltd (1354), St Monans and Abercrombie Community Council (680 & 682), Stuart Tarvit (2273): These proposals have been carried forward from the adopted St Andrews & East Fife Local Plan (2012). In the Proposed FIFEplan LDP, land previously identified as coming forward after 2018 has
been incorporated into a single site proposal. The allotments proposal (STM 003), which was previously shown with an indicative location has now been shown with a specific site boundary.

Since the adoption of the Local Plan, Fife Council has undertaken consultation on a Draft St Monans Development Framework during January and February 2013. A follow up exercise followed through the Community Council and Allotment Association to try to find an acceptable alternative allotment site between March and April 2013 as the location of allotments had been a significant issue identified through the consultation. As no appropriate alternative site could be found Fife Council’s position is that the Development Framework should proceed with allotments as previously identified on land to west of the Manse. An updated Indicative Development Framework has been included in the Proposed Local Development Plan, which takes on board comments on the Draft framework.

A Proposal of Application Notice (ref: 14/03773/PAN) has subsequently been received by Fife Council for land on the eastern part of the site, comprising the initial development phase set out in the adopted Local Plan.

The promoters of the site have requested that the Indicative Development Framework and reference to it be removed from the plan. Fife Council considers that it is appropriate and useful to include the Indicative Development Framework in the plan in view of the prominence of the site, and the way it interacts with the existing village. It is titled an ‘Indicative’ framework and Fife Council would be willing to consider favourably amendments to the specific layout of uses, providing that this can be achieved whilst meeting the principles of the Indicative Development Framework.

Fife Council considers that there may be merit in amending the first sentence of the developer requirements for this site to read ‘STM 001 and STM 003 to be in accordance with the principles set out in the Development Framework diagram overleaf.’, and invites the Reporter to make an appropriate recommendation on this matter.

It is considered that the requirements placed on potential developers of the site are reasonable. The requirement for allotments on this site has been known for some time through the preparation of the adopted Local Plan, and should therefore be accounted for within land costs. All other requirements set out are consistent with what Fife Council would require of a housing development of this scale.

The Indicative Development Framework includes a vehicle connection to Queen Margaret Street. This is considered to be consistent with the aims within Designing Streets (Core Document CD24, pages 19 and 20), to provide connected street networks. Other potential vehicular through links to the residential area to the south of the site were explored through work on the draft Indicative Development Framework but none were found to be suitable.

Potential for a future access route for the St Monans Fire Station to the north is supported by Fife Council to allow for a more direct route out to the A917 road for emergency use. The details of this access are more appropriately explored through the planning application process.

Fife Council considers it appropriate to identify 3m footpath/cyclepath provision on the north and east boundaries of the site. Fife Council has a long-term aspiration to extend
national cycle route 76 ‘Round the Forth’ between Kirkcaldy and St Andrews (although no funding has yet been secured). Additionally the provision of a footpath/cyclepath would also improve access to Elie and Earlsferry as well as farmshops at Bowhouse Farm and Ardross. The route from Elie to Pittenweem has been identified as a Proposed Future Core Path (ref PF32). Fife Council does, however, consider that there is merit in amending the wording in the Green Network Priorities to clarify that at the present time national cycle route 76 does not adjoin the site, and invites the Reporter to make an appropriate recommendation on this matter.

The promoters of the site have raised concerns about requirements for delivery of connections and landscaping on third party land. Fife Council owns the land directly adjoining the site to the south. No land in any other ownership is considered necessary to bring forward the identified requirements, and it is therefore deemed that there will be no ‘ransom strips’ or other constraints.

SEPA (3643): Support for Proposed FIFEplan position is noted.

Allotments (STM 003)

St Monans Allotments Association (351 & 352), St Monans and Abercrombie Community Council (680 & 682), J Thomson (1033), Muir Homes Ltd (1938), Stuart Tarvit (2273). Following consultation on a Draft St Monans Development Framework, Fife Council undertook a follow up exercise with the St Monans and Abercrombie Community Council and St Monans Allotment Association to try to find an acceptable alternative allotment site as the location of allotments had been a significant issue identified through the consultation. As no appropriate alternative site could be found Fife Council’s position is that the Indicative Development Framework should identify allotments as previously identified on land to west of the Manse.

The precise location of the allotments is likely to be explored through a planning application following the submission of a Proposal of Application Notice in late 2014. It is noted that the allotment proposal in the adopted Local Plan shows the location of allotments indicatively. As noted above the Indicative Development Framework will allow some flexibility in the precise location of land uses, and Fife Council planning officers are likely to consider such amendments favourably providing that these do not conflict with the principles of the Indicative Development Framework.

Some comments question the scale of allotment provision required. St Monans and Abercrombie Community Council question whether some of the 0.8Ha of land could be used for other uses, such as an extension of the play park and additional screening. The quantity of land for allotments has been supported by Fife Council’s allotments officer. Further consideration of land required for allotment provision will take place through the planning application process. Should less land be required for allotments, alternative uses for that land will be considered as part of the process. The Indicative Development Framework shows an orchard/community garden adjoining existing open space, and refers to merging and widening open space on the former railway line, whilst also requiring improvements to play facilities.

Fife Council would not object to showing the allotments proposal indicatively on the Proposals Map to allow further flexibility in the precise site boundary as long as the developer requirements make clear that allotment provision will be on the eastern part of the site.
Support for this proposal is noted from St Monans Allotments Association who highlight support and demand for allotment provision within St Monans.

STM 004 Cemetery, St Monans Church

SEPA (3644): Support for the Proposed FIFEplan position is noted.

COUNTRYSIDE AREA

LWD 024: Carnbee Cemetery

SEPA (3267): The Scottish Environment Protection Agency seek a change that a Flood Risk Assessment be included as a site specific developer requirement for this proposal. Fife Council considers that there is merit including the need for a Flood Risk Assessment as a site specific developer requirement for this proposal, and invites the Reporter to make an appropriate recommendation on this issue.

Sites (not in the Proposed FIFEplan) proposed by objectors

Lundin Homes (3918): Lundin homes object to the non-inclusion of candidate site LDP-LWD014 ‘Greenside, near Montrave’ for an experimental energy efficiency testing and demonstration project for ‘solar housing’. This represents a refinement of previous submissions promoting an eco-village concept of approximately 50 houses and associated rural employment space. It is unclear how many houses would be involved in the proposal but the submission highlights that significantly lower density development would be required.

It remains Fife Council’s position that candidate site LDP-LWD014 should not be allocated for development. The site is located away from any settlement in a location considered unsustainable. Development would be reliant on car-travel to access any shops or local services. Development of the site is also considered likely to have a significant landscape impact. The Council is, however, willing to work with Lundin Homes to find a policy compliant site for the experimental model.

Reporter’s conclusions:

ANSTRUTHER AND CELLARDYKE

ANS 001: Cellardyke Caravan Park

1. ANS 001 is situated at the eastern end of Anstruther and Cellardyke within the built-up area, and it extends to 10.8 hectares. Housing construction is well underway. A modern health centre is located on the north western boundary of the site. Its allocation for housing in the proposed plan is a continuation of its housing allocation in the adopted local plan. The estimated capacity of the site in the proposed plan is 331 houses. It contributes to meeting the housing land requirement, and is a part of the settlement strategy. In a settlement grouping of this size, which is recognised as a tier 3 principal settlement in TAYplan and has an important role as a local service centre for East Neuk, I consider the scale of this development to be acceptable in principle. There are 3 other housing proposals identified in the proposed plan, including 2 housing opportunity sites. These proposals would have an estimated capacity of 28 houses, of which 23 are
allocated to the 2 housing opportunity sites.

2. The representation believes that discussions with NHS Fife on local GP and healthcare services would be of benefit. While I have no doubt that this is correct, I note that the planning authority indicates that NHS Fife has already been consulted on the proposed plan. Planning permission has also already been granted for a large part of the housing proposed in the settlement grouping. If further discussions are still considered necessary in this case, I am satisfied that they do not require a development plan context, and a reference in the proposed plan, to take place.

3. Overall, no adjustment is required to the proposed plan.

ANS 006: Adjacent to fire station

4. ANS 006 is situated towards the eastern end of Anstruther, in the built-up area. It is on the north side of Mayview Avenue, to the east of its junction with Ladywalk, and is a small, irregularly shaped site, extending to about 0.1 hectare. The site is in a poor condition, and currently appears to be in use for parking. It is a new employment allocation in the proposed plan, which indicates that it is an opportunity to provide lock-ups/small workshops (class 4 [business]).

5. There is a dispute over the ownership of the site between the council and the representor. While this needs to be resolved, it does not need to affect any allocation in the proposed plan, which would set the context for assessing proposals brought forward for the site. I note that there is housing close to the site, but am satisfied that small class 4 business workshops would be a reasonable use because the 1997 Town and Country Planning (Use Classes)(Scotland) Order indicates that such development should be capable of being carried out in any residential area without detriment to its amenity. The council proposes that the description of the allocation be changed from employment to development opportunity. I consider that this revised description would more accurately reflect the lock-up use referred to in the proposed plan (or an open parking area), which I am also satisfied could potentially be acceptable in this location. The revised description would not prevent any class 4 business workshops coming forward, and the site should therefore remain part of the employment land supply. Potentially, other uses could be considered appropriate as well.

6. I believe that the right of way/access over the site referred to by both the representor and the council is a more detailed matter which is more appropriately considered through the planning application process. It would not, in itself, be sufficient to prevent the allocation of the site as a development opportunity in the proposed plan. In coming to my conclusions on the representation, I have taken into account the schemes put forward by the representor.

7. Overall, an adjustment is required to the proposed plan.

Non-inclusion of site: LDP-ANS001 land to north of Crail Road, Anstruther

8. The development of this 9.5 hectare site for housing and a supermarket would extend the settlement grouping of Anstruther and Cellardyke further eastwards, along the northern side of the A917. The site comprises the southern section of a gently undulating field. It lies outwith the settlement boundary, and its designation as countryside in the proposed plan is a continuation of its countryside designation in the
adopted local plan. The existing housing allocation (ANS 001), which has an estimated capacity of 331 houses, is under construction, and is situated immediately opposite the site, on the southern side of the A917.

9. Development of the site would extend built development into the relatively open area between the settlement grouping and Kilrenny, creating the visual impression when travelling along the A917 that the gap between them is closing. While I do not find this, in itself, to be unacceptable, I consider that the treatment of the gap remaining between any extended settlement grouping and Kilrenny, and the treatment of the new settlement edge, would require careful consideration, with the principles set out in the proposed plan. This important matter has not been addressed in the representation. I also note that the edges of the existing settlement grouping by the site are well defined, and that the site’s proposed long northern boundary is, at present, no more than an arbitrary line crossing a field. While the site is not covered by a landscape designation, it provides an attractive edge to the settlement. I am also not persuaded that an extension of this size and configuration into the countryside area would constitute just a rounding off of the settlement. In the circumstances, I am not satisfied that the allocation of this site for a development of approximately 240 houses and a supermarket, has been properly justified in landscape terms.

10. Anstruther and Cellardyke combine to form a large coastal village, and local service centre for the East Neuk area. The village centre and local services could reasonably be accessed from the site on foot, despite the site’s location on the north eastern edge of the settlement grouping. Vehicular access could be taken from the A917. I acknowledge that Anstruther is a tier 3 principal settlement in TAYplan, and that such settlements should accommodate a small share of the region’s additional development. I accept that this would support the case for allocating the site for housing. However, the proposed plan makes provision for housing development within Anstruther, including the housing allocation opposite the site at ANS 001. I believe that it is appropriate to allow a large development such as ANS 001 to be completed before bringing forward a further large scale expansion of the settlement grouping. I also believe that it is reasonable in principle for the council to allocate new sites in other settlements in the East Neuk area. TAYplan allows local development plans to provide some development in settlements that are not defined as principal settlements. Within the strategic context provided by TAYplan, I am satisfied that it is appropriate for the East Neuk Community Action Plan to be used to inform the longer term growth strategy for the wider area, and to help identify the development proposals for inclusion in the local development plan, because the preparation of such action plans involves a range of local stakeholders.

11. I acknowledge that there is a shortfall in meeting the housing land requirement in the SESplan area of Fife together with the uncertainties expressed with regard to the level of that shortfall under Issue 2(b) Homes. However, the conclusions find that adequate housing land has been provided in the TAYplan area in line with the requirements set out in the strategic development plan. In addition, the 2015 Housing Land Audit has found that there is a 5 year effective housing land supply in both the Cupar and North West Fife and St Andrews and North East Fife Housing Market Areas. Accordingly, there is no strategic numerical justification to allocate further sites for housing within the TAYplan area. In any event, even if there was such a justification, I do not consider that this would outweigh the concerns I have about allocating a site of this size at this time. This is particularly so given the lack of any meaningful landscape appraisal against which the impact of such development on the local area could be properly assessed.
12. Turning to the supermarket proposal, I note that the site is outwith the local centre, and that it is not in a sequentially preferred location for retailing. It has also not been demonstrated that there are no sequentially better sites available. Indeed, no proper sequential assessment was included with the representation. The 2014 Fife Retail Capacity Study indicates that there is no requirement for additional convenience goods floorspace in East Fife across the period 2014-24. It may be that some new floorspace could be justified to reduce the leakage of expenditure from East Fife. However, there is no evidence with the representation to support the assertion that there is an urgent need to accommodate new convenience floorspace within the East Neuk area. I agree with the council that higher levels of leakage of expenditure are to be expected from this part of Fife because of its scattered settlement pattern and small population. In the circumstances, I do not consider that it would be appropriate to allocate the site in part for a supermarket.

13. Overall, no adjustment is required to the proposed plan.

COLINSBURGH

Colinsburgh Issues and COB 001: South east of village

14. COB 001 is situated at the eastern end of Colinsburgh, a small, linear village, which straddles the B942. It comprises part of a field on the southern side of the B942, and extends to 3.7 hectares, rather than the 2.4 hectares stated in the proposed plan. Its allocation for housing in the proposed plan is a continuation of its housing allocation in the adopted local plan, albeit that the phasing proposed in the adopted plan has now been removed. The estimated capacity of the site is 40 houses, which is an appropriate scale of development for this size of settlement. It contributes to meeting the housing land requirement, and is a part of the settlement strategy.

15. The representations propose and support the extension of the allocation southwards to occupy the whole field. The council believes that there is merit in such an extension. I also consider that the proposed extension is acceptable because the southern edge of the field would be based on an existing boundary treatment, which includes banking, access would be improved through the continuation of the proposed access road to South Wynd, and additional green space would be provided. I also agree that the extension would provide better scope to improve the approach to Colinsburgh from the south. The masterplan exercise undertaken indicates that this 2ha extension would increase the capacity of the larger site to at least 43 houses, depending on the house types to be used. I am satisfied that such a modest increase in the estimated capacity would be acceptable, albeit that the actual capacity of the site could only be determined once detailed site assessment and design have been undertaken.

16. Bearing in mind the green space and associated proposals set out in the masterplan for the extended site, I also agree with the council that it would be appropriate to introduce green network priorities, as outlined below, in the development requirements for this site in the proposed plan. In all the circumstances, I consider that the site should be extended as proposed in the representations, and that its size should accordingly be changed to 5.7 hectares.

17. Turning to the general Colinsburgh issues, there are 2 other allocations included in the proposed plan – COB 002, a small housing opportunity site, and COB 003, a site for the expansion of the primary school. While expressing support for the 3 allocations,
Colinsburgh and Kilconquhar Community Council also states that it would like to encourage the further expansion of Colinsburgh. I note that there are no other proposed development sites in Colinsburgh before the examination. I agree with the council that the allocations included in the proposed plan provide a reasonable rate of growth for a small village, and that further appropriate opportunities for expansion could be considered in the East Neuk Community Action Plan and the next local development plan.

18. Overall, adjustments are required to the proposed plan

KILCONQUHAR

Settlement boundary adjustment

19. The site forms part of an attractive, narrow, open space separating the 2 small, built up areas of Kilconquhar and Barnyards. The open space is designated in the proposed plan as part of a larger local landscape area. The proposed plan shows the same boundaries and designation for the site as the adopted local plan. On the Kilconquhar and Barnyards settlement map, the settlement boundary line cuts through the middle of the garden of 41 Main Street. Part of the garden is therefore within the settlement boundary, and the remainder is in the open space and designated as a local landscape area. The council agrees that the settlement boundary should be changed to include the remaining part of the garden. This change would not materially affect the area of open space, and I consider that it would be reasonable and logical. I am also satisfied that, to all intents and purposes, the character and appearance of the open space, and the settlement itself, would be preserved. Overall, an adjustment is required to the proposed plan.

Non-inclusion of sites: Rear of 49 Main Street and North of Greenbrig Road

20. The small site at the rear of 49 Main Street forms part of an attractive, narrow, open space separating the 2 small, built up areas of Kilconquhar and Barnyards. The open space is designated in the proposed plan as part of a larger local landscape area, and it includes Barnyard Marsh Nature Reserve. This designation is a continuation of the local landscape area designation in the adopted local plan. The proposed allocation of this site for housing would extend built development into this important area of open space, and would materially and unacceptably reduce the gap between the 2 built up areas in a prominent location. In the circumstances, I consider that a housing development here would have a significant detrimental effect on the wider area, and that it would not preserve the character or appearance of either the open space or the settlement itself.

21. The other site is situated at the northern corner of the junction between Greenbrig Road and the B941 (St Andrews Road) on the north eastern edge of Kilconquhar and Barnyard. It comprises the southern part of a large open field, is designated countryside in the proposed plan, and includes a small designated area of protected open space at its south eastern corner. These designations are a continuation of the countryside and protected open space designations covering the site in the adopted local plan. I consider that Greenbrig Road forms a well established satisfactory and appropriate northern edge for Kilconquhar and Barnyard. While this edge has been breached at Alexander Cottage, it is a single, minor breach, which I am satisfied is not significant. The proposed allocation of the site for housing would materially extend Kilconquhar and Barnyard northwards, causing a significant, unacceptable breach of its northern
boundary, and disrupting the existing historic, attractive and compact settlement form. It would neither round off nor naturally extend the village. I also note that the site’s proposed northern boundary is, at present, no more than an arbitrary line crossing a field. Drawing these matters together, I consider that a housing development here, in this prominent location, would be likely to have a significant detrimental effect on the area, and that it would not preserve the character or appearance of the settlement.

22. Kilconquhar and Barnyards combine to form a small village. I accept that the limited local facilities and services would be accessible on foot from both sites, and that satisfactory vehicular access could probably be achieved. However, these factors in themselves would not justify bringing the sites forward for development in this case.

23. I acknowledge that there is a shortfall in meeting the housing land requirement in the SEPlan area of Fife together with the uncertainties expressed with regard to the level of that shortfall under Issue 2(b) Homes. However, the conclusions find that adequate housing land has been provided in the TAYplan area in line with the requirements set out in the strategic development plan. In addition, the 2015 Housing Land Audit has found that there is a 5 year effective housing land supply in both the Cupar and North West Fife and St Andrews and North East Fife Housing Market Areas. Accordingly, there is no strategic numerical justification to allocate further sites for housing within the TAYplan area. In any event, even if there was such a justification, I do not consider that this would outweigh the concerns I have about allocating the sites and the detrimental effect their development would have on this sensitive location. I also consider that it would be inappropriate to allocate these sites because they have not been included in the candidate site selection process, and have therefore not been the subject of a site assessment or public consultation. Accordingly, and for all the reasons set out, I do not consider that these sites should be preferred over other sites allocated for housing in the proposed plan.

24. Overall, no adjustments are required to the proposed plan.

LOWER LARGO

LLA 001: East of Durham Wynd

25. LLA 001 is situated at the north eastern edge of Lower Largo, and adjoins housing to the south and west. Its allocation for housing in the proposed plan is a continuation of its allocation for housing in the adopted local plan. The estimated capacity of the site in the proposed plan is 60 houses. It contributes to meeting the housing land requirement, and is a part of the settlement strategy.

26. The site comprises a field, extends to 3.2 hectares, and is on the southern side of the A915. There is a ridge line and plateau along the northern edge of the site, running from west to east. The majority of the allocation slopes down from the ridge line and plateau southwards, towards the existing housing, playing field and community hall to the south. The council has now indicated that planning permission has been granted for a housing development on site by decision notice dated 26 January 2016. The representations made to the allocation have therefore clearly been overtaken by events, and it should remain in the plan. However, even if there was no planning permission, I consider that development here represents a natural extension of the village taking into account the existing housing on 2 sides of the site and the set back of the allocation from the A915. While the allocation would take Lower Largo closer towards Upper Largo, it
would only be marginally closer and, I note a difference in elevation between the 2 villages, which helps enhance their sense of separation. I do not consider that the allocation would give rise to either actual or perceived coalescence. I am satisfied that the allocation is sufficiently distant from Largo House that it would be unlikely to affect the character of this category B listed building and its setting. Similarly, I am satisfied that the allocation would be unlikely to unacceptably impinge on the Serpentine Walk. Road safety has been highlighted as a concern, but the roads authority has not indicated that the road network would be unable to cope with the additional traffic.

27. The council highlights that the illustration in the proposed plan at page 143 – East of Durham Wynd - Site Features – should be adjusted to make the boundary of the allocation clear and show that the land adjacent to the A915 is not allocated for development. I agree that the illustration is unclear on the extent of the allocation and the position of the village boundary, and that changes along these lines, and a change to the title, to clarify that it is concerned with both site context and features, would address the comments made about the extent of the allocation in the representations.

28. Overall, an adjustment is required to the proposed plan.

PITTENWEEM

Non-inclusion of site: LDP-PIT001 Maw Dubs and Ninian Faulds

29. The development of this one hectare site for housing would extend Pittenween further northwards alongside Charles Street, a minor road. The site comprises the eastern part of a large field. It lies outwith the settlement boundary, and its designation as both countryside and local landscape area in the proposed plan is a continuation of its countryside and local landscape area designation in the adopted local plan. There is an existing housing allocation at St Margaret’s Farm (PIT 001), which has an estimated capacity of 70 houses.

30. The site is a narrow one, and its development would extend this compact village noticeably into the open countryside on the western side of Charles Street. It would be neither a natural extension nor a rounding off of the village, and its linear form would create an inappropriate, prominent ribbon style of development alongside the road. I note that the site’s northern and western boundaries do not follow any clear features on the ground. They appear, at present, no more than arbitrary lines in a field, and this impression remains even though there is an adjacent former railway line to the north. The treatment of the new settlement edges would require careful consideration, and the representations have not addressed this important matter. I also note that the current boundary of the local landscape area appropriately follows the line of Charles Street, a clear existing feature. If the site was allocated for housing, this boundary would have to be pulled back to the unsatisfactory western and northern boundaries of the site. In the circumstances, I am not satisfied that the allocation of the site for housing would be appropriate, or that its release has been properly justified in landscape terms.

31. Pittenween is a small coastal village. Some local facilities, such as the primary school and community hall, could reasonably be accessed from the site on foot, and there is a core path and cycle route adjacent. The village centre is less accessible from the site on foot because of the site’s edge of village location. Vehicular access to the site could reasonably be taken from Charles Street. I note that the site is being promoted by representatives of the local community, and this should be encouraged.
However, the proposed plan already makes reasonable provision for housing development within the village through the allocation of PIT 001, and I consider the location of the site proposed here to be inappropriate for the reasons set out above. I agree with the council that, within the strategic context provided by TAYplan, the East Neuk Community Action Plan is an appropriate vehicle to use to inform the longer term growth strategy for the wider area, and to help identify development proposals for inclusion in the local development plan, because the preparation of such action plans involves a range of local stakeholders.

32. I acknowledge that there is a shortfall in meeting the housing land requirement in the SESplan area of Fife together with the uncertainties expressed with regard to the level of that shortfall under Issue 2(b) Homes. However, the conclusions find that adequate housing land has been provided in the TAYplan area in line with the requirements set out in the strategic development plan. In addition, the 2015 Housing Land Audit has found that there is a 5 year effective housing land supply in both the Cupar and North West Fife and St Andrews and North East Fife Housing Market Areas. Accordingly, there is no strategic numerical justification to allocate further sites for housing within the TAYplan area. In any event, even if there was such a justification, I do not consider that this would outweigh the concerns I have about allocating this inappropriate extension of the settlement. I also have concerns about the lack of any landscape justification for the proposed release.

33. Overall, no adjustments are required to the proposed plan.

ST MONANS

STM 001 and STM 003 – West of Manse

34. STM 001 and STM 003 are situated on the north western edge of St Monans, a compact village located on the southern side of the A917. They comprise a large field (5.2 hectares), which currently separates the village from the A917. They adjoin housing to the south, and the Manse and business and service uses to the east. Their allocation for housing (STM 001) and allotments (STM 003) is a continuation of their allocations for housing and allotments in the adopted local plan, albeit that the phasing proposed in the adopted plan for the housing site has now been removed. The estimated capacity of the housing site is 100 houses, which is an appropriate scale of development for this size of settlement. It contributes to meeting the housing land requirement, and is a part of the settlement strategy.

35. The concerns in the representations focus, in the main, on the detailed indicative development framework and the development requirements which are included in the proposed plan. The council proposes to change the wording in the development requirements to indicate that STM 001 and STM 003 are to be in accordance with the principles set out in the indicative framework. I believe that it is appropriate to retain the framework in the proposed plan because it helps inform the preparation of development proposals and discussions between all parties. I agree that the framework should be indicative in order that a more flexible approach may be adopted at the planning application stage. This would allow the proposals to evolve in response to more detailed site specific work. To ensure that this is achieved, I consider that it is necessary to change the council’s proposed wording for the development requirements for STM 001 and STM 003 to indicate that they should reflect the principles in the indicative framework.
36. I am not persuaded that the details of the indicative framework require to be changed. The provision made for allotments in both the framework and STM 003 appear reasonable bearing in mind that there appears to be some local support for such facilities, and a waiting list. The council indicates that it has considered other sites for development as allotments in St Monans, and that no appropriate alternatives have been identified. Other possible sites are referred to in the representations, but it has not been demonstrated that they are better locations for the allotments, and that they have clear advantages over the allocated site. While concern was expressed over the location and extent of the allotments, I agree with the council that these matters can reasonably be considered through the planning application process.

37. I believe that the provision in the indicative framework for road links through to the housing area to the south should be retained because they provide clear benefits ie for emergency use related to the fire station, and for improved connectivity to the village. Without the links, the site would be much more cut off from the village. I note that the land required to make the links is owned by the council, and therefore I do not believe that ownership would represent a significant barrier to delivery. A more detailed justification for the links and the means of delivery can be considered at the planning application stage. I also believe that including, as a green priority, a 3 metre wide pavement/cyclepath along the northern edge of the allocations is important because, in broad terms, it would promote active travel and improve access, all in line with Scottish Planning Policy. However, the council indicates that National Cycle Route 76 does not at present adjoin the site. I therefore consider that the reference to this route in the development requirements should be deleted.

38. The council has now indicated that it has resolved to grant planning permission for 57 houses on the eastern part of the site by draft decision notice dated 8 October 2015. Provision is also made for the allotments. The representations made to the allocations are therefore being overtaken by events. However, I consider that the indicative framework still has an important role to play because it can usefully help inform any subsequent proposals that may come forward for the eastern part of the site, if the current proposals fail to proceed, and it forms an appropriate context and provides guidelines for proposals that emerge for the remainder of the site.

39. Overall, adjustments are required to the proposed plan, as set out below.

COUNTRYSIDE AREA

LWD 024: Carnbee Cemetery

40. Carnbee Church and Cemetery lie at the eastern edge of Carnbee. A burn runs to the east of them, and the Scottish Environment Protection Agency are concerned that the burn may pose a small flood risk for the proposed cemetery extension, which may affect its design. Scottish Planning Policy explains that the planning system should prevent development which would have a significant probability of being affected by flooding. The council agrees with the Scottish Environment Protection Agency that a flood risk assessment should be carried out in this instance, and I am satisfied that it would be appropriate to add it to the development requirements for this allocation.

41. Overall, an adjustment is required to the proposed plan, as set out below.
42. The development of this 7 hectare site for housing could potentially introduce a significant number of houses into a countryside location. The site is situated to the north of Lundin Links and Lower Largo and to the south of Ceres and Craigrothie, on the northern side of a minor road, and it comprises a field. Its designation as both countryside and local landscape area in the proposed plan is a continuation of its countryside and local landscape area designation in the adopted local plan.

43. The site slopes down towards the south, is very prominent, is in an attractive, rolling landscape, and provides views over the surrounding countryside and the coast to the south. There are one or 2 houses in the surrounding area, including 2 on the opposite side of the minor road. This is a large site, but it is isolated, being well separated from any settlement. Development of a site of this size and in this rural landscape would be difficult to screen effectively, and the existing trees around the site would be an insufficient treatment. It would be likely to be clearly visible from some distance away, would be in stark contrast to its rural surroundings, and would result in the suburbanisation of the countryside. As such, it would have a significant adverse effect on the character and appearance of this countryside area, and it would materially detract from the local landscape area. Development here would be contrary to the spatial strategy of TAYplan and the proposed plan, which both focus such development on sites within and adjacent to settlements. On the same basis, it would also be contrary to the policy principles of Scottish Planning Policy.

44. Facilities and services are some distance away in settlements, and would not be accessible on foot. Any development would be primarily dependent on the private car to use local facilities and services. Furthermore, vehicular access would be on to a road with a 60 miles per hour speed limit, and the additional traffic manoeuvring could adversely affect traffic safety, albeit that this is a quiet, minor road. I am not satisfied that a housing development in this location would support the sustainable patterns of transport and travel which underpin the spatial strategy.

45. I acknowledge that there is a shortfall in meeting the housing land requirement in the SESplan area of Fife together with the uncertainties expressed with regard to the level of that shortfall under Issue 2(b) Homes. However, the conclusions find that adequate housing land has been provided in the TAYplan area in line with the requirements set out in the strategic development plan. In addition, the 2015 Housing Land Audit has found that there is a 5 year effective housing land supply in both the Cupar and North West Fife and St Andrews and North East Fife Housing Market Areas. Accordingly, there is no strategic numerical justification to allocate further sites for housing within the TAYplan area. In any event, even if there was such a justification, I do not consider that this would outweigh the concerns I have about allocating this isolated, rural site, contrary to the spatial strategy of both TAYplan and the proposed plan. I have taken account of the fact that the development would involve the creation of an energy efficient solar testing and demonstration housing project, in association with Abertay University, and the possibility of 50 houses being provided along with associated rural employment space (1850 square metres), but consider that such projects would be better undertaken in a more sustainable location, which was consistent with the spatial strategy.

46. Overall, no adjustments are required to the proposed plan.
Reporters recommendations:

I recommend that the following modifications be made:

1. In reference ANS 006 (adjacent to fire station), page 23, delete the description given of “Employment” and insert, in its place, “Development Opportunity.”

2. In reference COB 001 (South East of Village), page 46, delete the area given of 2.4 hectares and the estimated capacity (housing) of 40 and insert, in their place, an area of “5.7” hectares and an estimated capacity of “43” houses.

3. In reference COB 001 (South East of Village), page 46, delete the additional development requirement of providing high quality development edges and boundary treatments to the eastern and south eastern edges of the site, and insert, in its place, the following text to read:

   “Green Network Priorities for this site are:
   - Establish a high quality landscape edge along the eastern and southern boundaries to incorporate new habitat and SUDs provision and to include native planting and wildflower grassland adjacent to the farmland.
   - Extend the existing Mayfield Terrace play area adjacent to the site to provide an area of kick about space, and provide high quality development edges overlooking the play area.
   - Provide high quality development edges to Main Street and Mayfield Terrace.”

4. In the Inset Map for Colinsburgh, extend the boundary of Proposal COB 001 southwards to match the boundary shown in the Indicative (master)plan for COB 001, and the revised site boundary plan, as contained in the document titled Fife Local Development Plan Submission, Colinsburgh, Site COB 001 + 002, December 2014.

5. In the Inset Map for Kilconquhar & Barnyards, adjust the settlement boundary at 41 Main Street to include the area coloured red as shown on the modified Inset Map for Kilconquhar & Barnyards attached to representation 515 from Colinsburgh & Kilconquhar Community Council.

6. In reference LLA 001 (East of Durham Wynd, Lower Largo), page 143, adjust the illustration to include the housing allocation as shown on the Inset Map for Lundin Links, Lower Largo and Upper Largo, adjust the illustration to include the village boundary for this part of Lower Largo as shown on the Inset Map, and adjust the title of the illustration so that it reads:

   “East of Durham Wynd – Site Context and Features”

7. In references STM 001 (West of Manse) and STM 003 (West of Manse), page 171, adjust the first sentence of the additional development requirements so that it reads:

   “Sites STM 001 and STM 003 should reflect the principles set out in the Indicative Development Framework diagram overleaf.”
8. In reference STM 001 (West of Manse), page 171, adjust the first bullet point of the additional development requirements relating to green network priorities so that it reads:

   “Provide a 3 metre wide pavement/cyclepath along the northern edge of the site and establish a high quality development edge on to this route.”

9. In reference LWD 024 (Carnbee Cemetery), page 187, add a new sentence to the additional development requirements to read:

   “A Flood Risk Assessment is required. Design of development must take account of the findings of the flood risk assessment.”
### Issue 15b

<table>
<thead>
<tr>
<th><strong>Development plan reference:</strong></th>
<th>Settlement Plans (East Neuk): Crail (pages 51-52), Countryside Area (LWD 022: Crail Airfield) (page 186), and Countryside Issues</th>
<th><strong>Reporter:</strong> Dilwyn Thomas</th>
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**Body or person(s) submitting a representation raising the issue (including reference number):**

**CRAIL**
- Max Taylor (893)
- A & M Logan (1043, 1060)

**CRA 001: Pinkerton Farm Phase 2**
- Royal Burgh of Crail and District Community Council (52)
- Max Taylor (890)
- Christopher Dean (1664)

**CRA 002: Crail North**
- Royal Burgh of Crail and District Community Council (53)
- Crail Preservation Society (108)
- David Jerdan (782)
- David Mann (810)
- Peter Salkeld (825)
- Ewan Mitchell (837)
- David Hobbs (852)
- Jandy Hobbs (855)
- Max Taylor (859)
- Jamie Donohoe (869) (871)
- Cindy and Rick Scheyer (1014)

**CRA 002: Crail North (cont)**
- R M Stephen (1016)
- Susan Irvine (1137)
- Ian Robertson (1200)
- High Point Crail (1388)
- Lesley Lind (1407) (1408)
- David Mann (1458)
- Jean Nale (1521)
- Jean Watson (1560)
- Will Cresswell (1569)
- Jean Durie (1652)
- Barbara Meldrum (1654)
- Christopher Dean (1662)
- Graham Lennox (1789)
- Elis Reekie (2089)
- SEPA (3343)
- NHS Fife (3840)

**COUNTRYSIDE AREA**
- LWD 022: Crail Airfield
- Landvest PCC Ltd (2203)

**COUNTRYSIDE ISSUES**
- Michael Logan (1024)

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**Provision of the development plan to which the issue relates:**

Settlement Plans (East Neuk): Crail (pages 51-52), Countryside Area (LWD 022: Crail Airfield) (page 186), Countryside Issues

**Planning authority’s summary of the representation(s):**

**Crail Issues**

Prof Max Taylor (893): The overall plan for Crail is limited, naive in quality and aspiration, unrealistic, and fails to take into account the reality of living in a small community like Crail. The addition of a new centre threatens existing shops in Crail which are vulnerable. Increased stress on school, transport and services. Failure to consider the impact on the local community of such a large increase in housing stock,
and no attempt to explore the housing needs of Crail. The proposals will not contribute to social justice, nor will they address community needs.

CRA 001: Pinkerton Farm Phase 2

Royal Burgh of Crail and District Community Council (52): This development is almost complete. The Community Council’s objection to the overdevelopment of the site, high density small properties, no garden space, lack of employment opportunities and inadequate parking was overruled by the Reporter. Properties are likely to be let for social housing rather than employed people.

Prof Max Taylor (890): This development was approved by a reporter but attracted substantial local opposition. The objections raised seem to be coming true. This development offers a case study of how poor planning can give negligible benefits in terms of social justice and community cohesion, but meet the needs of a bureaucratic and largely unaccountable planning process aligned to the needs of developers rather than local communities. This planning exercise has all the qualities of making the same mistakes for the same reasons.

Christopher Dean (1664): The recent incongruous housing development at Caraille Green which is nearing completion and was strongly objected to by the local community is an example of how the planning process operates on a tick box basis with no cognisance of local issues or environment and the development plan for Crail bears all the same hallmarks.

CRA 002: Crail North

Principle of development

Royal Burgh of Crail and District Community Council (53), Crail Preservation Society (108), David Jerdan (782), David Mann (1458), Prof Max Taylor (859), Christopher Dean (1662), Ewan Mitchell (837), Commander David Hobbs (852), Jandy Hobbs (855), Peter Salkeld (825), Cindy & Rick Scheyer (1014), R M Stephen (1016), Professor Will Cresswell (1569), Barbara Meldrum (1654), Jamie Donohoe (869, 871), Susan Irvine (1137), Ian Robertson (1200), Lesley Lind (1408), Jean Nale (1521), Jean Watson (1560), Jean Durie (1652), Graham Lennox (1789), Elis Reekie (2089): Object to the proposed allocation of the site.

High Point Crail Ltd (1388): Support the proposed allocation of the site. HPC Ltd have employed a design team to prepare the Indicative Development Plan working with Fife Council. The Indicative Development Plan has been carefully designed for the sustainable community expansion of Crail. It provides an opportunity for good urban design, integrated mixed uses, safe and multi-use movement routes, and a high quality of urban realm environment. This work has been endorsed by Fife Council and a Scottish Government Reporter.

Lesley Lind (1408): Development at Crail Airfield would be preferable where the listed buildings can be renovated and with a small housing development priced in such a way to encourage local families to buy them.

David Mann (810, 1458): Consideration should be given to impact of additional potential development at Crail Airfield.
General comments on the scale and location of development

Crail Preservation Society (108), Christopher Dean (1662), Graham Lennox (1789), Prof Max Taylor (859), Jean Durie (1652), Professor Will Cresswell (1569), Ian Robertson (1200), Susan Irvine (1137), David Mann (810, 1458), R M Stephen (1016), Cindy & Rick Scheyer (1014), Jandy Hobbs (855), Commander David Hobbs (852), Ewan Mitchell (837), Peter Salkeld (825), David Jerdan (782): The scale of the proposed development is disproportionate to the size and character of Crail.

Crail Preservation Society (108): This proposal goes far beyond development proposed in the adopted Local Plan.

Royal Burgh of Crail and District Community Council (53), Professor Will Cresswell (1569), Lesley Lind (1408), Peter Salkeld (825), David Jerdan (782): Development will be peripheral to and has poor connections to Crail.

Elis Reekie (2089): Development could create an almost separate community with its own centre, shops and transport access. It would not, therefore, add to the community life of the village.

Prof Max Taylor (859): Adding peripheral elements that seem largely designed to fill gaps in a map suggests a failure of vision and competence.

Prof Max Taylor (859): Brownfield development opportunities in the South of Fife provide a better balance between employment and housing need.

Landscape, townscape, views and character

Elis Reekie (2089), Christopher Dean (1662), Graham Lennox (1789), Jean Durie (1652), Barbara Meldrum (1654), Jean Nale (1521), Lesley Lind (1408), Ian Robertson (1200), Susan Irvine (1137), Jamie Donohoe (869, 871), R M Stephen (1016), Cindy & Rick Scheyer (1014): Development will negatively impact on the characteristics of the village (historic, traditional, rural and quiet). This is likely to impact negatively on the tourist trade.

Jean Durie (1652), Jean Nale (1521), Susan Irvine (1137): Development will not form an attractive ‘gateway’ to Crail.

Jean Nale (1521), Susan Irvine (1137): Concerns over generic modern housing development in Crail, which will be out of keeping with the historic nature and architecture of Crail.

Lesley Lind (1408): Proposed urban form would be inappropriate to countryside setting. Any development should be very small scale and low key to match with the nature of the village.

Lesley Lind (1408): The houses will not blend into the landscape at all even with one-storey houses at the front. They will still be easily seen on the road approach to Crail.

Employment Land/Economy

High Point Crail Ltd (1388): Object to Fife Council’s decision to place large employment
land buildings on the St Andrews Road boundary. Highpoint Crail originally presented a plan that broke down the scale of these buildings and integrated them within the block layout of the Plan, whilst maintaining the 1 Ha requirement. It is wrong to locate employment buildings into an area of land so important as an entranceway to a historical Fife fishing village.

Crail Preservation Society (108), Lesley Lind (1408), David Mann (810, 1458): The location of proposed employment will have a negative visual impact.

Jean Watson (1560), Graham Lennox (1789), Prof Max Taylor (859), Jean Durie (1652), Ian Robertson (1200), Jamie Donohoe (869, 871), Ewan Mitchell (837): There are not the employment opportunities in the local area to support a development of this size.

Royal Burgh of Crail and District Community Council (53): Proposed employment land could improve the viability of Crail but is likely to be low on the list of priorities of a developer of the site.

Crail Preservation Society (108), Ewan Mitchell (837), Peter Salkeld (825), David Jerdan (782): There is no indication of demand for additional industrial space in Crail.

Lesley Lind (1408), David Mann (810, 1458), Ewan Mitchell (837): Employment should be concentrated at Crail Airfield. Crail Preservation Society (108): Any industrial land should be located at Crail airfield site with a link road avoiding the village centre and residential areas.

Prof Max Taylor (859): Development seems to be based on assumptions of economic growth of which no evidence is provided.

David Mann (810, 1458): A few home/work units could be incorporated within the housing areas. Some workshop/retail/holiday activity might be considered for the old Garden Centre.

Lesley Lind (1408): It would be preferable to invest in the businesses which are in the centre of Crail. Small scale viable businesses would attract permanent owners to Crail.

Infrastructure and services

Prof Max Taylor (859), Prof Will Cresswell (1569), Jean Nale (1521), Lesley Lind (1408), David Mann (810, 1458), Cindy & Rick Scheyer (1014), Ewan Mitchell (837), Peter Salkeld (825), David Jerdan (782): Concerns raised over the impact on the school and other services. The school is at capacity and there is not room to expand. Development will overwhelm nearby medical facilities. There is no GP facility in Crail.

NHS Fife (3840): Potential additional 382 houses in local area could impact on healthcare services. Note the inclusion of a Care Home Village within development and initial investigations should be carried out to determine if there is scope for inclusion of potential primary care health service provision.

Amenity

Prof Max Taylor (859): No evidence is presented of the social and economic impacts of development on Crail. Development will negatively impact on quality of life of residents.
Housing/Affordable housing/Care Home issues

Crail Preservation Society (108), Lesley Lind (1408), David Mann (810, 1458), Jandy Hobbs (855), Ewan Mitchell (837), Peter Salkeld (825): Question the demand for new houses in Crail.

Jean Watson (1560), Royal Burgh of Crail and District Community Council (53), Crail Preservation Society (108), Graham Lennox (1789), Prof Max Taylor (859), Prof Will Cresswell (1569), Lesley Lind (1408), Jamie Donohoe (869, 871), Jandy Hobbs (855), Commander David Hobbs (852), Peter Salkeld (825), David Jerdan (782): Concerns raised over the type and size of housing, and that many of the homes built will become holiday homes, as has been the case on the adjoining Balcomie Green development.

Royal Burgh of Crail and District Community Council (53): The proposal for a care home is welcomed and should be conditioned to ensure delivery.

David Mann (810, 1458): The care home “village” is good but should be closer to St Andrews Road, allowing access to public transport and the existing village centre.

Lesley Lind (1408): Questions the need for a care home and notes remoteness from urban areas.

David Mann (810, 1458): The need for family sized housing with gardens for families and “early retirees” should be acknowledged.

Transport

High Point Crail Ltd (1388): Object to Fife Council’s decision to block vehicle traffic into Bow Butts. The connectivity using the existing bell mouth at Bow Butts and enhancing the quality of public realm is essential to the integrity of this Plan. Public consultations recorded no objections to this access, which would increase permeability with Crail and avoid new development being a disconnected housing estate.

David Mann (810, 1458): The removal of the proposed access through Bow Butts is supported.

Jamie Donohoe (869, 871), Lesley Lind (1408), Prof Will Cresswell (1569), Crail Preservation Society (108), Lesley Lind (1408), Ian Robertson (1200), David Mann (810, 1458), Peter Salkeld (825), Cindy & Rick Scheyer (1014): Proposed development will create/increase traffic problems in Crail and surrounding roads. Some comments note concern about increased traffic within the Balcomie Green development.

Jean Watson (1560): The access entrance to this "new site" is at an already difficult and dangerous part of the St Andrews Road.

Lesley Lind (1408): The planned road running behind the Balcomie Caravan Park cuts across two public footpaths. These are Core Paths regularly used by locals to enjoy the peace and quiet of these paths which lead eventually on to the Fife coastal path. If there is a need for a road to Balcomie Road then it makes more sense to take the road past Wormiston and down past the abandoned pig farm buildings.
Jean Watson (1560), Prof Max Taylor (859), Lesley Lind (1408): Transport links in the area are poor.

**Proposed Local Centre**

Crail Preservation Society (108), Prof Max Taylor (859), Jean Nale (1521), Ian Robertson (1200), Susan Irvine (1137), David Mann (810, 1458), Cindy & Rick Scheyer (1014), Jandy Hobbs (855), Commander David Hobbs (852), Peter Salkeld (825): A new local centre is not needed and will be detrimental to village centre shops.

Cindy & Rick Scheyer (1014): There is shopping available in nearby St Andrews and Anstruther.

Graham Lennox (1789): A second ‘centre’ creates divisiveness within the village.

**Environment**

Lesley Lind (1408): Concern that development will not include attractive natural environment.

Lesley Lind (1408): Concern over impact on wildlife. The area left beside the burn behind the Glebe does not appear to be very extensive. There is a need for a wildlife corridor from the Denburn woods to the adjoining fields. Planting a few trees is insufficient and a large roundabout opposite the end of Denburn Wood is very close to the burn. High density housing along the edge of the path and behind the Glebe would not allow birds access to fields beyond. The woods and fields are home to owls, a peregrine falcon, foxes, hares, rabbits, grouse, deer and lapwings.

**Miscellaneous**

Royal Burgh of Crail and District Community Council (53), Prof Max Taylor (859), Susan Irvine (1137), David Mann (810, 1458), David Jerdan (782), Jamie Donohoe (869, 871): The views of the community have not been addressed.

Lesley Lind (1408): Information about the planned development has not been communicated widely or in a transparent manner.

Royal Burgh of Crail and District Community Council (53): The revised location of the cemetery extension is supported.

SEPA (3343): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken.

Ewan Mitchell (837): There is nothing in place to make sure that the developers build houses and nothing else and nothing to restrict the growth to a 20 year plan.

Crail Preservation Society (108): Whilst development is phased over 20 years development may come forward earlier.

David Mann (810, 1458): Can the maximum number of houses brought forward within in the plan period be limited to 160, legally and, in planning terms?
Sites (not in the Proposed FIFEplan) proposed by Objectors

A & M Logan (1060): Objection to the non-allocation of land to the South East of the Anstruther Road (candidate site LDP-CRA002) for residential development. It lies adjacent to the settlement boundary on its north side. The site is suitable for development. The landowner remains committed to early release for development. Allocation of this site would not compromise the plan strategy but would assist addressing the shortfall in the effective housing land supply. Allocation of the site is supported by Scottish Planning Policy and PAN 2/2010: Affordable Housing and Housing Land Audits through providing for a flexible and generous supply of land. There is need for short-term release of small scale development. A 13.7% margin percentage is inadequate to meet the requirement for generosity of supply set out in SPP due to reliance on St Andrews West. The site is effective in terms of PAN 2/2010 criteria.

A & M Logan (1043): Objection to the non-allocation of land to the North West of the Anstruther Road (candidate site LDP-CRA001) for residential development in the Proposed FIFEPlan. It lies adjacent to the settlement boundary on its east and south sides. The site is suitable for development. The landowner remains committed to early release for development. Allocation of this site would not compromise the plan strategy but would assist addressing the shortfall in the effective housing land supply. Allocation of the site is supported by Scottish Planning Policy and PAN 2/2010: Affordable Housing and Housing Land Audits through providing for a flexible and generous supply of land. There is need for short-term release of small scale development. A 13.7% margin percentage is inadequate to meet the requirement for generosity of supply set out in SPP due to reliance on St Andrews West. The site is effective in terms of PAN 2/2010 criteria.

COUNTRYSIDE AREA

LWD 022: Crail Airfield

Landvest PCC Ltd (2203): Support the continued allocation of Crail Airfield for mixed-use development. The proposed land uses are supported subject to the wording 'limited' housing. This restriction should be removed as it is not necessary or reasonable. It is a ‘constraint’ to development and provides uncertainty. Landvest PCC Ltd has recently started to progress a planning application for the site. In order to meet objectives and requirements for the site there will need to be more than ‘limited’ housing, not least to secure sufficient enabling development to conserve and repair listed buildings on site. The scale and form of future residential development will be guided by conservation and other planning objectives through the development management process. The proposed expansion at Crail North for 320 units is certainly not ‘limited’ residential development and does not need to cross-fund a number of development requirements. It does however indicate a requirement for at least 320 houses to be developed over the plan period at Crail. Priority, in terms of housing provision, should be afforded to Crail Airfield, which is a brownfield site, where there is strong support from Historic Scotland for the restoration of the listed buildings.

Landvest PCC Ltd (2203): Support other requirements of this proposal. Progress through the planning application process, including public consultation and environmental assessment, indicates the commitment of Landvest PCC Ltd to this site. An Initial Development Concept Framework for the site is provided in support of this submission.
Landvest PCC Ltd (2203): FIFEplan may struggle to achieve its growth objective in the St Andrews & North East Fife HMA, not least should St Andrews West Strategic Development Area fail to come forward timeously. It is considered that flexibility should be provided elsewhere in the HMA through Crail Airfield.

COUNTRYSIDE ISSUES

M Logan (1024) objects to the non-inclusion of land for housing at Sypsies, Crail, on the basis that: the site has an extant planning permission in principle for 12 houses and is allocated for residential development in the adopted St Andrews & East Fife Local Plan; it is a well located and effective site; and it can contribute towards meeting the housing land requirement whilst being of such a scale that it would not undermine the Development Plan strategy of concentrating new development at the St Andrews West Strategic Development Area.

**Modifications sought by those submitting representations:**

**Crail Issues**

Prof Max Taylor (893): No specific FIFEplan amendment is stated.

**CRA 001: Pinkerton Farm Phase 2**

Royal Burgh of Crail and District Community Council (52), Prof Max Taylor (890), Christopher Dean (1664): No specific FIFEplan amendment is stated.

**CRA 002: Crail North**

Royal Burgh of Crail and District Community Council (53), Crail Preservation Society (108), David Jerdan (782), David Mann (1458), Prof Max Taylor (859), Christopher Dean (1662), Ewan Mitchell (837), Commander David Hobbs (852), Jandy Hobbs (855), Peter Salkeld (825), Cindy & Rick Scheyer (1014), R M Stephen (1016), Prof Will Cresswell (1569), Barbara Meldrum (1654), Jamie Donohoe (869, 871), Susan Irvine (1137), Ian Robertson (1200), Lesley Lind (1408), Jean Nale (1521), Jean Watson (1560), Jean Durie (1652), Graham Lennox (1789), Elis Reekie (2089): Delete proposal CRA 002.

High Point Crail Ltd (1388):

- Amend Indicative Framework Plan to show a road link from the site into Bow Butts.
- Amend Indicative Framework Plan to relocate employment land buildings away from the entranceway to the site, broken down in scale and integrated within the block layout of the Plan.

Lesley Lind (1408), David Mann (810, 1458), Ewan Mitchell (837): Employment should be concentrated at Crail Airfield.

Crail Preservation Society (108): Amend proposal. Industrial land should be located at Crail airfield site with a link road avoiding the village centre and residential areas.

Crail Preservation Society (108), Prof Max Taylor (859), Jean Nale (1521), Ian Robertson (1200), Susan Irvine (1137), David Mann (810, 1458), Cindy & Rick Scheyer...
(1014), Jandy Hobbs (855), Commander David Hobbs (852), Peter Salkeld (825): Delete proposed local centre.

David Mann (810, 1458): Consider incorporating home/work units within housing areas. Consider workshop/retail/holiday activity at the old Garden Centre to the west of St Andrews Road.

Lesley Lind (1408): Consider instead small-scale housing development at Crail Airfield.

Lesley Lind (1408): If a road to Balcomie Road is required this should run past Wormiston and the abandoned pig farm buildings instead of running behind the Balcomie Caravan Park.

David Mann (810, 1458): Relocate the proposed care home “village” closer to St Andrews Road.

Sites (not in the Proposed FIFE plan) proposed by Objectors

A & M Logan (1060): Allocate land to the South East of the Anstruther Road (candidate site LDP-CRA002) for residential development.

A & M Logan (1043): Allocate land to the North West of the Anstruther Road (candidate site LDP-CRA001) for residential development.

COUNTRYSIDE AREA

LWD 022: Crail Airfield

Landvest PCC Ltd (2203): The word ‘limited’ in relation to housing should be removed.

COUNTRYSIDE ISSUES

M Logan (1024): Allocate land at Sypsies, Crail, for 12 houses.

Summary of responses (including reasons) by planning authority:

Crail Issues

Prof Max Taylor (893): The proposals for Crail, include a long-term allocation of land to the north of the village (CRA 002: Crail North) to provide for the growth of Crail over the next 20 years. Building on land allocated in the existing adopted St Andrews and East Fife Local Plan (CD9), the proposals incorporate a design led solution, with a mix of uses including employment land, which is much needed in the East Neuk area, and a mix of housing tenures.

Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision. Detailed matters will also be dealt
with at planning application stage.

See below for further information and responses relating to Proposal CRA 002.

CRA 001: Pinkerton Farm Phase 2

Royal Burgh of Crail and District Community Council (52), Prof Max Taylor (890), Christopher Dean (1664): Comments on the planning process are noted. Application 13/00532/FULL was approved at appeal. This proposal remains under construction (near completion at time of writing). Comments relating to the consultation process are addressed in the Statement of Conformity (CD45).

CRA 002: Crail North

Principle of Development

Royal Burgh of Crail and District Community Council (53), Crail Preservation Society (108), David Jerdan (782), David Mann (1458), Prof Max Taylor (859), Christopher Dean (1662), Ewan Mitchell (837), Commander David Hobbs (852), Jandy Hobbs (855), Peter Salkeld (825), Cindy & Rick Scheyer (1014), R M Stephen (1016), Prof Will Cresswell (1569), Barbara Meldrum (1654), Jamie Donohoe (869, 871), Susan Irvine (1137), Ian Robertson (1200), Lesley Lind (1408), Jean Nale (1521), Jean Watson (1560), Jean Durie (1652), Graham Lennox (1789), Elis Reekie (2089), High Point Crail Ltd (1388), Lesley Lind (1408), Mr David Mann (810, 1458): This proposal provides a mixed use development including housing, employment and an extension to the cemetery. The proposal is considered to allow for a design led solution to defining a natural boundary for existing allocated land for the northern expansion of Crail. The proposal builds on the adopted St Andrews and East Fife Local Plan (CD9) allocated sites CRA 02, CRA 03 and CRA 04 which were identified with an indicative boundary.

Since the preparation of the Local Plan, High Point Crail have worked with Fife Council officers to produce an indicative development framework for the site for inclusion in the Local Development Plan. It is considered that the design work has been of high quality, and will help to ensure a high quality of urban realm environment with an integrated mixed of uses, and active travel routes.

There are two issues relating to the Indicative Development Framework on which High Point Crail are not in agreement with Fife Council: the location of proposed employment land; and, the provision of vehicular access routes. Fife Council’s response to these is set out under the headings of ‘Employment Land/Economy’ and ‘Transport’ below. High Point Crail has drafted an “alternative” development framework which takes account of their two points of dissention from the FIFEplan position, and this can be made available to the Reporter if requested.

During the preparation of the Proposed Local Development Plan, developer interest has emerged in bringing forward redevelopment at Crail Airfield (Proposal LWD 022). Fife Council considers there is scope for development to occur at both locations, albeit that the level of housing currently proposed by the promoters of land at Crail Airfield is likely to be of a scale that would create a significant oversupply of housing in the area, particularly when considered cumulatively with development at Crail North. It is recognised that redevelopment at Crail Airfield offers the potential to secure the long term renovation and reuse of buildings and land on an important historic site. However, it
is considered that Crail North offers a better location in principle for housing and employment uses given the better road access and closer proximity to existing services and facilities. Fife Council's response relating to Crail Airfield is set out below at the end of this Issue.

General comments on the scale and location of development

Crail Preservation Society (108), Christopher Dean (1662), Graham Lennox (1789), Prof Max Taylor (859), Jean Durie (1652), Prof Will Cresswell (1569), Ian Robertson (1200), Susan Irvine (1137), David Mann (810, 1458), R M Stephen (1016), Cindy & Rick Scheyer (1014), Jandy Hobbs (814), Commander David Hobbs (852), Ewan Mitchell (837), Peter Salkeld (825), David Jerdan (782), Crail Preservation Society (108). Royal Burgh of Crail and District Community Council (53), Prof Will Cresswell (1569), Lesley Lind (1408), David Jerdan (782), Elis Reekie (2089), Prof Max Taylor (859): The boundary of the site has been identified based on a consideration of existing landscape features, topography and views. The urban grain of development shown in the Indicative Development Framework has been designed to reflect the traditional pattern of development within the centre of Crail. This has informed the capacity identified for the site. Whilst the overall number of houses in the Proposed Local Development Plan (320 houses) is an increase on the indicative housing capacity set out in the adopted Local Plan (140 houses), the boundary of the existing proposal in the adopted Local Plan was a flexible one, designed to offer the opportunity for a developer to create a well-designed development, rather than to adhere to a straight line on a plan. The 320 house figure also provides a long-term allocation over 20 years. The developer requirements state that the indicative number of houses to be developed within the Local Development Plan period is 160, or 16 a year on average, which is considered to be an appropriate level of growth.

Fife Council considers the site to be a natural extension of Crail, with opportunities to make good active travel connections from the site into the rest of the village.

Landscape, townscape, views and character

Elis Reekie (2089), Christopher Dean (1662), Graham Lennox (1789), Jean Durie (1652), Barbara Meldrum (1654), Jean Nale (1521), Lesley Lind (1408), Ian Robertson (1200), Susan Irvine (1137), Jamie Donohoe (869, 871), R M Stephen (1016), Cindy & Rick Scheyer (1014): Sensitive landscaping and design are important for this site particularly on the northern approach, and will be ensured through developer requirements for this site. The Indicative Development Framework sets the basis for a high quality development. The framework has been based on an analysis landscape features, topography and views.

Crail currently has housing styles from a range of time-periods. The importance of the historic nature of the village is recognised, and will need to be a major consideration in any future, more detailed proposals for the site. The developer requirements stress the importance of high quality development, sensitive to the rural character on the northern approach to Crail, with a transition to higher densities around the proposed central square. High quality landscaping will also be required. Existing natural features should be retained in new greenspace.

The SEA Environmental Report assesses the potential significant environmental impact of implementing the policies and proposals contained within the Plan across a number of
themes - this includes landscape. The Plan has therefore been assessed for the extent to which its policies protect valued landscape areas and more local features of value and how its proposals may change areas of relatively high landscape value.

**Employment Land/Economy**

High Point Crail Ltd (1388), Crail Preservation Society (108), Lesley Lind (1408), David Mann (810, 1458), Jean Watson (1560), Graham Lennox (1789), Prof Max Taylor (859), Jean Durie (1652), Ian Robertson (1200), Jamie Donohoe (869, 871), Ewan Mitchell (837), Royal Burgh of Crail and District Community Council (53), Peter Salkeld (825), David Jerdan (782): The Fife Employment Land Strategy (FELS) sets out the essential elements required to ensure that an adequate supply of available employment land is provided in Fife. The Fife Employment Land Strategy is based on the focused drive of the Scottish Government, through economic strategy and planning policy at national, regional and local level, to create sustainable economic growth. In order to ensure Fife Council contributes to this aim, facilitating an effective supply of available land for employment is one of our important economic development functions.

An adequate employment land supply allows businesses to grow, invest and create jobs. The provision is therefore important in terms of the quantity of land available, but it is also essential that the supply provides for a wide range of quality offering a breadth of choice, and that it is located in the right places to meet the needs of employers and communities alike. The Fife Employment Land Strategy (FELS) approved by Fife Council in 2014 complements FIFEplan ensuring that Fife maintains adequate employment land across key settlements.

Whilst some comments received through the consultation question the demand for employment land, others recognise that its provision may assist the viability of Crail. Subsequent to the preparation of the Proposed Plan, Fife’s Economic Development team has indicated that, based on assessment of the up-to-date employment land situation, the employment land provision at this site could be reduced from 1ha to 0.5ha. The East Neuk has an overall adequate supply of employment land in FELS, however the majority of the available marketable employment land for the East Neuk is located at Anstruther, and it would be prudent to plan for some local provision within Crail.

Taking this into account, Fife Council considers that there may be merit in amending the developer requirements for the site from 1ha of employment land to 0.5ha, to more appropriately reflect demand for employment land in Crail, and invites the Reporter to make an appropriate recommendation on this issue. A change to the employment land requirement would potentially create a need to revisit the Indicative Framework Plan.

Another issue raised through the consultation relates to the location of the proposed employment land. High Point Crail and others consider that it is inappropriate to locate employment land adjacent to one of the main entrances to Crail.

It is Fife Council's position that the Proposed Local Development Plan needs to be realistic in providing employment land in a location where it will be viable. Good access to the road network and a degree of visibility are important requirements for employment land. The location of employment land adjacent to St Andrews Road achieves these requirements.

Fife Council considers that demand would mainly be for small scale businesses and not...
major industrial uses. The Indicative Development Framework identifies Class 4 uses as the predominant use with some Class 5 uses. Employment land could also include arts & crafts/tourism related activity. This could include projects similar to the nearby recently opened Cambo distillery.

Infrastructure and services

Prof Max Taylor (859), Prof Will Cresswell (1569), Jean Nale (1521), Lesley Lind (1408), David Mann (810, 1458), Cindy & Rick Scheyer (1014), Ewan Mitchell (837), Peter Salkeld (825), David Jerdan (782), NHS Fife (3840): Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be “on-demand” provision or upgrades to existing provision. Detailed matters, such as the specifications of road access and drainage arrangements for example, will be dealt with at planning application stage. The developer requirements highlight that development of this site will be phased to manage capacity issues at Crail Primary School.

Amenity

Prof Max Taylor (859): Issues relating to the amenity of existing residents such as noise, nuisance, smell, privacy, daylight etc. would be addressed at the detailed planning application stage. In this event, Local Development Plan Policy 10 ‘Amenity’ will help to protect existing amenity and assist the decision making process on planning applications. Economic impacts of development here are expected to be positive, based on the provision of more employment land creating more job opportunities and more local wealth. Social impacts from a well-designed integrated urban extension, with affordable and special needs housing included, are similarly expected to be positive.

Housing/Affordable housing/Care Home issues

Jean Watson (1560), Royal Burgh of Crail and District Community Council (53), Crail Preservation Society (108), Graham Lennox (1789), Prof Max Taylor (859), Prof Will Cresswell (1569), Lesley Lind (1408), Jamie Donohoe (869, 871), Jandy Hobbs (855), Commander David Hobbs (852), Peter Salkeld (825), David Jerdan (782), David Mann (810, 1458), Ewan Mitchell (837), NHS Fife (3840): Fife Council has a statutory duty to ensure that the FIFEplan Local Development Plan (LDP) conforms to the TAYplan Strategic Development Plan before it can be adopted. The Council must maintain at least a 5 year effective housing land supply in the St Andrews and North East Fife Housing Market Area, and the Local Development Plan should identify sufficient sites to meet the housing land requirement for 10 years as detailed in the TAYplan Strategic Development Plan. Allocating a generous supply of land for housing across the Housing Market Areas in the Local Development Plan gives the flexibility necessary for the continued delivery of new housing should unpredictable changes to the effective housing land supply occur during the lifetime of the Local Development Plan. Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with in Issue 2B Homes.

NHS Fife have noted in their comments the inclusion of a Care Home Village in the Indicative Development Framework and suggested initial investigations should be
carried out to determine if there is scope for inclusion of potential primary care health service provision. Taking this into account, Fife Council considers that there may be merit in highlighting a need to investigate the on-site provision of primary health care facilities in the developer requirements for the site, and invites the Reporter to make an appropriate recommendation on this issue. Need and demand for a care home would be investigated in more detail through any planning application for the site. Such a use could be situated in the proposed local centre adjacent to the proposed Care Home/Village to provide access to local services.

Fife Council cannot legally require the use of a house as a primary residence. In line with Local Development Plan Policy 2 Homes, Figure 2.2, at least 30% of any housing development in this area will be affordable housing, and the Council’s Supplementary Guidance on Affordable Housing provides detailed guidance on how affordable housing will be achieved and contains details of the mechanisms through which Affordable Housing will be kept affordable to meet the future needs of local people.

The developer requirements for the proposal demand a mix of tenures to provide for a range of housing and lifestyles. The details of this would be a matter for consideration at planning application stage.

Need and demand for a care home would be investigated in more detail through any planning application for the site. It is located beside the proposed local centre to provide access to local services.

Transport

High Point Crail Ltd (1388), David Mann (810, 1458), Jamie Donohoe (869, 871), Lesley Lind (1408), Prof Will Cresswell (1569), Crail Preservation Society (108), Lesley Lind (1408), Ian Robertson (1200), Peter Salkeld (825), Cindy & Rick Scheyer (1014), Jean Watson (1560), Prof Max Taylor (859): High Point Crail have objected to the non-inclusion of a vehicular link from the site to Bow Butts. One individual has supported the non-inclusion of this link. The road link had been included in a pre-consultation version of the Indicative Development Framework to allow better integration between new development and rest of Crail. It is supported by Fife Council transportation officers. There is however, understood to be significant local opposition to this road access based on the suitability of existing roads to accommodate additional traffic. Fife Council’s North East Fife Area Committee, on the 14th August 2014, commented that no new road link should be taken through land at Bow Butts. Fife Council planning offers agreed to recommend to Fife Council’s Executive Committee that the road link should be removed, and this was agreed by Executive committee on 9th September 2014.

A vehicular link via Bow Butts is not considered to be crucial to the functioning of this site. Existing footpath links will be retained providing some integration.

Fife Council Transportation officers have been involved throughout the development planning process and through discussions on the development framework. A Transport Assessment will be required as part of any planning application for the site. Although the Indicative Development Framework highlights the main principles for development, detailed matters will be dealt with at planning application stage.

The Indicative Development Framework and developer requirements seek to build on and expand upon existing footpaths, providing an improved network for pedestrians and
Proposed Local Centre

Crail Preservation Society (108), Prof Max Taylor (859), Jean Nale (1521), Ian Robertson (1200), Susan Irvine (1137), David Mann (810, 1458), Cindy & Rick Scheyer (1014), Jandy Hobbs (855), Commander David Hobbs (852), Peter Salkeld (825), Graham Lennox (1789): A local centre is included in the development framework to act as a local hub for the new development. The intention is that this would reduce the need for car use by providing some services within walking distance of new houses. Fife Council considers that the local centre should be limited in scale and uses to a level that provides for convenience shopping for the immediate neighbourhood and local community facilities. As stated above, it is considered that this could be a suitable location for primary health care facilities should there be demand for these.

Many comments consider that the a new local centre is not necessary and could be detrimental to shops in the centre of Crail. Crail is identified as a Local Centre in the Proposed Local Development Plan and would also receive protection through Policy 6 ‘Town Centres First’.

Taking all this into account, however, Fife Council considers that there may be merit in amending the developer requirements for the site to ensure that the proposed local centre would not impact negatively on Crail village centre, and invites the Reporter to make an appropriate recommendation on this issue.

Environment

Lesley Lind (1408): The SEA Environmental Report assesses the potential significant environmental impact of implementing the policies and proposals contained within the Plan across a number of themes - includes natural heritage and biodiversity. The Plan has therefore been assessed for the extent to which its proposals may affect wildlife and the natural environment.

The developer requirements for this site state that existing natural features should be retained in new greenspace and that no development should be within 10m of watercourses and boundary trees/hedgerows. The Green Network Priorities identified for the site also highlight the need to establish new greenspace as part of a strong green network, incorporating habitat provision.

The Indicative Development Framework includes green networks, including those running along the two burns that cross the site, linking the Denburn woods to the surrounding countryside. Further detail and consideration will be required at the planning application stage, in terms of the form and layout of these green spaces and any studies required to assess impact on wildlife.

Miscellaneous

Royal Burgh of Crail and District Community Council (53), Prof Max Taylor (859), Susan Irvine (1137), David Mann (810, 1458), David Jerdan (782), Jamie Donohoe (869, 871), Lesley Lind (1408), Ewan Mitchell (837), Crail Preservation Society (108): Comments relating to the consultation process are addressed in the Statement of Conformity (CD 45).
Representations made at all stages of the Local Development Plan process are taken into account by planning officers, and each iteration of the Plan is subject to approval by Fife Council Committees.

Details relating to the provision of non-housing uses would be addressed at the planning application stage, to ensure a mixed-use development with appropriate community facilities.

The developer requirements state that the indicative number of houses to be developed within the Local Development Plan period is 160. Should a planning application be submitted within the Local Plan period for more than this amount, it would need to demonstrate that all impacts could be addressed satisfactorily.

Sites (not in the Proposed FIFEplan) proposed by Objectors

A & M Logan (1060): The Proposed Local Development Plan allocates land for housing across the St Andrews and North East Fife Housing Market Area, sufficient to meet statutory requirements.

It remains Fife Council’s position that land to the South East of the Anstruther Road, Crail (candidate site CRA 002) should not be allocated for development. The Proposed FIFEplan allocates sufficient land for housing in both Crail and the East Neuk Settlements. At this time, there is no need to allocate this site for housing. The site would extend the settlement into its landscape setting and is considered likely to have a negative landscape impact.

It remains Fife Council’s position that land to the North West of the Anstruther Road (candidate site CRA 001) should not be allocated for development. The Proposed FIFEplan allocates sufficient land for housing in both Crail and the East Neuk Settlements. At this time, there is no need to allocate this site for housing. The site has limited potential to integrate with Crail and would extend the settlement into its landscape setting.

Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with in Issue 2B Homes.

COUNTRYSIDE AREA

LWD 022: Crail Airfield

Landvest PCC Ltd (2203): This proposal has been carried forward from the adopted St Andrews & East Fife Local Plan (2012). In late 2014, a Proposal of Application Notice (ref: 14/03593/PAN) was submitted by Landvest PCC Ltd.

The developer requirements for this site allow for the continuation of some outdoor events, existing and new employment uses, multi-use commercial or leisure development, holiday accommodation, and limited housing development. The requirements also highlight the built heritage sensitivities of this site, which includes a Scheduled Ancient Monument and numerous listed buildings.

Landvest PCC Ltd have requested deletion of the word ‘limited’ in relation to housing development. An Initial Development Concept Framework submitted by Landvest PCC
Ltd contains a proposal showing up to 510 houses on the site, in addition to other uses including an craft village, community, tourism, commercial and employment uses. The proposal seeks to achieve the restoration of the most significant historic buildings on site.

One of the main aims of the existing proposal is to secure the renovation of the Listed Buildings on site, and it is recognised that enabling development is likely to be necessary to achieve this. The reference to ‘limited’ housing development is considered to be a cautious but flexible approach.

A development of 510 units would not be consistent with the requirements set out in the plan, and would create a large addition to the housing land supply. This may have significant strategic implications particularly for other strategic housing allocations and local plan designations in the Local Plan area. The housing numbers proposed would form a significant proportion of the housing likely to take place within the St Andrews and North East Fife Housing Market Area outwith the main principal settlements set out in TAYplan. It is the view of Fife Council officers that any application proposing a significant level of housing should be accompanied with a robust planning statement which fully addresses the impact this development would have on planned housing supply in relation to the development plan.

Landvest PCC Ltd have also recommended that priority be given to Crail Airfield over the identification of additional land at Crail North (CRA 002). Fife Council considers that the additional land identified at Crail North allows for a design led solution to defining a natural boundary for existing allocated land (with an indicative boundary) for the northern expansion of Crail.

COUNTRYSIDE ISSUES

M Logan (1024) An outline planning application to form 12 residential units at Sypsies (near Crail) (06/04136/EOPP) was approved in February 2008, following appeal. The site was allocated within the adopted St Andrews & East Fife Local Plan on the basis of the upheld appeal. The application expired in February 2011. The proposal was removed from the plan due to the expiration of the planning approval, and as the proposals were considered to be ineffective. More recently, planning permission in principle to form 12 residential units was approved in June 2013 (application reference 12/00874/PPP). Taking this into account, Fife Council considers that there may be merit in re-introducing a proposal for this site in the Local Development as a Housing Opportunity Site to recognise the recent planning approval, and invites the Reporter to make an appropriate recommendation on this issue.

Reporter’s conclusions:

Crail issues

1. Housing markets areas, not individual settlements, are the geographical areas used to determine housing requirements. Scottish Planning Policy explains that one of the roles of the planning system is to identify a generous supply of land for each housing market area to support the achievement of the housing land requirement. The overall adequacy of the supply across the plan area is considered in detail at Issue 2(b) Homes.
2. Crail is within the St Andrews and North East Fife Housing Market Area. TAYplan sets out the average annual housing market build rate required across the housing market area to ensure an appropriate supply of housing land is provided. Within the East Neuk area, Crail is a village of a size which can reasonably accommodate some of the growth required. While Crail is not identified as a principal settlement, TAYplan indicates that some development may be accommodated in settlements that are not defined as principal settlements. It is appropriate to allocate a range of sites across a housing market area. Given this context, I am satisfied that the council acted reasonably in identifying a significant development opportunity for a range of housing and other uses, including a local centre, in Crail. This is particularly so in light of the fact that the council expects this development opportunity to extend beyond the period of the proposed plan, and to take place over 20 years. I believe that this lengthy timescale would allow the village to reasonably adjust and support the proposed expansion. I note that the principle of identifying "longer term development" in Crail is established in the adopted local plan, and I am satisfied that it is reasonable to continue this vision, albeit on a larger scale, into the proposed plan, based on a design led approach.

3. In preparing the proposed plan, I note that the council has consulted the education and road authorities and other service providers, and that none have objected in principle to the proposed expansion of the village because of increased stress on community services and infrastructure. The council also indicates, and I accept, that where stress points have been identified, provision could likely be made to mitigate the effects of development on them. In the circumstances, I do not consider that the expansion proposals for the village could be justifiably rejected on these grounds. There is also no evidence which demonstrates that the expansion proposals would undermine the village centre. The effects of development on the existing centre, community services and infrastructure would be assessed again once detailed proposals and a planning application have been prepared. Drawing these matters together, I do not consider that the expansion of Crail could be regarded as likely to have an unacceptable impact upon the local community.

4. I consider these matters further below, in relation to CRA 002 Crail North.

CRA 001: Pinkerton Farm Phase 2

5. CRA 001 is a 5.7 hectare housing site, which is located in the eastern part of Crail, on the northern side of Balcomie Road. The proposed plan estimates the capacity of the site as 62 houses. The site has planning permission for housing, and is now largely built out. The representations are critical of the nature of the development. However, given the situation on site, it is clearly appropriate to include it within the local development plan as a housing allocation. There is therefore no need for any adjustment to be made to the plan. Concerns about the likely nature of development that may emerge on other housing allocations in Crail are dealt with below.

CRA 002: Crail North

6. CRA 002 is a 13.5 hectare mixed use site, which is located on the northern edge of Crail, to the north of Bow Butts, CRA 001 and Balcomie Links Caravan Park. Housing and employment uses, and a cemetery extension, are proposed. The proposed plan estimates the total housing capacity of the site as 320 houses, with an indicative number of 160 being built over the 10 year plan period. This is a significant increase on the scale of development put forward in the adopted local plan for a total of 140 houses on a
7. The adopted local plan indicates that the population of the village of Crail was 1,742 people. While I acknowledge that an allocation of the scale proposed would therefore represent a significant expansion of the village, in my view, it would remain small. I note the proposed allocation is a part of the housing land supply, and contributes towards meeting the housing land requirement for the housing market area and TAYplan. Concern was expressed about the new housing being purchased as second homes or for holiday lets, but as the council points out it cannot exercise control over this. The proposed plan requires that the allocation provides a mix of tenures offering a range of house types and life styles. Affordable housing would also have to be provided as a part of the proposed allocation, in line with Policy 2 of the proposed plan and the council’s Affordable Housing Supplementary Guidance. I am satisfied that this represents a reasonable approach to the development of the site.

8. While the proposed plan identifies capacity issues at Crail Primary School, and there may be issues for other services, such as primary health care, none of these undermine the allocation. Instead, they have a bearing on the likely pace of development. The council’s suggestion that the development requirements in the proposed plan should include a reference to investigating on-site provision of primary health care facilities is reasonable, and appropriately addresses the representations on this matter. I do not consider the proposed average build rate of 16 houses per year to be excessive. If planning applications are submitted proposing higher build rates and/or additional housing, they would need to show that all the impacts could be satisfactorily addressed. Where shortfalls in services are identified, developer contributions could be required to ensure adequate provision in line with Policy 4: Planning Obligations. In the circumstances, I consider that the social impacts of the additional population proposed could probably be satisfactorily absorbed.

9. The allocation forms a sweep of land around the northern edge of Crail. While it is generally open, and lacks significant features, Crail Burn and Den Burn cross the site, and there are trees in parts of it. No landscape designations cover the site. Development of the eastern part of the allocation would have less visual impact than the western part, because the former would be partially enclosed by the built development to the south east and south west, and the latter would be adjacent to the A917. While this is a greenfield site, in the absence of sufficient and appropriate brownfield sites, and of sites within settlements, sites such as this, adjacent to settlements, are to be preferred. I consider that this is an appropriate direction in which to extend the village because it avoids the more sensitive coastal area. I am satisfied that the allocation represents a natural and reasonable extension of the village, and that an appropriate and clear landscaped edge could be established along its northern boundary. In the circumstances, I do not consider that the allocation would have an unacceptable and harmful effect on the village’s landscape setting.

10. I note that the allocation is not affected by any natural environmental designations, and that the proposed plan seeks to protect the main natural features on site, including the habitats alongside the 2 burns. Further greenspace provision, as part of a strong green network through the site, is also required as a part of the proposals. I can see nothing in the evidence which indicates that the likely effects of development at this location on the natural environment would be sufficient to undermine the allocation and justify its removal from the plan.
11. The central part of Crail is designated a conservation area. It therefore has statutory protection in respect of its character and appearance. Much of the edge of the conservation area is made up of protected open space, and I am satisfied that this contributes to maintaining the character and townscape of the village’s historic core. Around the conservation area, there are more recent developments which, in my view, do not detract from the character of the central area. I also believe that the additional development now proposed would have little effect on the village’s historic heritage and character. Regarding the proposed local centre, I am satisfied that it is intended to be no more than a hub for its immediate surroundings. I also note that the village centre will be protected under the terms of Policy 6: Town Centres First. Nonetheless, I recognise the importance of the village centre to the whole community and the historic character of the village, and I therefore agree with the council that the proposed plan should indicate that the local centre should not negatively impact on the vitality and viability of the village centre.

12. The proposed plan indicates that the allocation is to include 1 hectare of employment land for classes 4 (business), 5 (general industrial), and 6 (storage and distribution) uses. I consider that the employment site is an important element of the allocation because it would contribute to providing more employment opportunities locally, which would help make the residential development more sustainable, and it would add to the choice of sites available in the East Neuk. I agree with the council’s view that the size of the employment allocation could be reduced to 0.5 hectares because the Fife Employment Land Strategy 2014-2021 indicates that the East Neuk, which is identified as a “key settlement”, has a sufficient supply of employment land. I accept that the best location for the employment land is adjacent to the A917 because this would provide good access from and to the main road, and good visibility from it. These are important requirements for businesses. Given the reduction in size of the employment site and its prominence, I believe that it should be aimed only at class 4 (business) uses. Such an approach would be more compatible with achieving the “new gateway” to the village envisaged in the development requirements, and with the adjoining housing. The reference to classes 5 (general industrial), and 6 (storage and distribution) uses should therefore be deleted from the proposed plan.

13. The proposed plan requires that the allocation should integrate and connect with the existing settlement, whilst providing an alternative route to Balcomie Road. It also requires a transport assessment. I consider that the allocation is reasonably accessible to the centre of Crail and local facilities, including bus routes, on foot and by cycling. I therefore do not agree that these connections would be poor, or that the allocation could reasonably be regarded as detached.

14. The developer requests that a vehicular link be provided from the allocation to Bow Butts. This link is supported by the council’s transportation officers, but is opposed by the local community. The council’s North East Fife Area Committee is also of a view that this link should not be provided. I note that the text of the development requirements set out in the proposed plan does not explicitly exclude such a link. I appreciate that there would be concerns about the effects on residential amenity should Bow Butts be used as a main access, but its use as a secondary vehicular access could potentially assist the development to connect and integrate with the existing village. I believe that it would be best for this matter to be considered in detail (through the transport assessment) at the time of any formal proposal. I am therefore satisfied that it is unnecessary to specify such a link in the proposed plan. While some concerns were expressed about the proposed road linking the A917 to the west with Balcomie Road to the east, careful
15. The proposed plan includes an indicative development framework for this allocation, which sets out the principles on which the proposals should be based. I agree with the council that the framework needs to be revisited because of the reduction in the requirement for employment land. It is also necessary to investigate the possible provision of primary health care facilities, and how this may best be accommodated within the framework. In these circumstances, I believe that the current indicative development framework should be deleted from the proposed plan, and that the wording of the development requirements for this allocation should be changed to require the preparation of another one, which should set the principles to guide the development of the site. The community should be consulted on the framework, including its preparation. In revising the framework, further consideration could also usefully be given to the access arrangements currently shown at the southern end of the site close to Denburn Wood which, on the face of it, appear excessive, and whether or not a vehicular access, particularly a secondary one, is taken through Bow Butts. I do not consider that this matter needs to be highlighted in the development requirements because it is more a matter of detail, which can reasonably be dealt with at a later stage.

16. Reference is made to directing this proposed development to the former Crail Airfield. I consider the potential for development at that location below. However, I believe that to be a separate issue, which should be considered in its own right, and not directly related to proposed development in the village itself.

17. Overall, and taking into account the various representations, I consider that the allocation is an acceptable extension of the village, which should be supported, subject to adjustments to the proposed plan, as set out below.

Non-inclusion of sites: LDP-CRA001 and CRA002: Land to west of Crail (north CRA001 and south CRA002 of road [A917])

18. The development of these 2 sites for housing would extend Crail further westwards alongside the A917, the main coastal road at this point. The sites comprise the eastern parts of large fields, and LDP CRA001 extends to around 3.8 hectares, and LDP CRA002 to about 2.6 hectares. Their designation as countryside (LDP CRA001 and LDP CRA002) and local landscape area (LDP CRA002) is a continuation of their countryside and local landscape area designations in the adopted local plan. There are housing allocations at Pnkerton Farm Phase 2 (CRA 001) and Crail North (CRA 002), which have a total estimated capacity of 382 houses, albeit that CRA 001 is now largely built out.

19. The 2 sites extend from the coastline to the south, to a narrow track serving farm cottages and Kirkmay Farm to the north. They form part of a flat, open, sensitive coastal landscape, and are prominent. LDP CRA002 is particularly sensitive given its location adjacent to the coast, and this is recognised by its inclusion in the local landscape area. I acknowledge that a part of LDP CRA001 is shielded behind existing properties, and this could potentially allow a limited amount of development on this site. However, I note that the existing western edge of Crail at this point is clearly defined, and that the proposed western boundary of the sites as proposed, which would form the new western edge of Crail, do not follow any clear features on the ground, but are merely lines across
a field. Given the prominence of the sites and their sensitive location, the treatment of any new settlement edge would require careful consideration, and the representations have not addressed this important matter. I am not satisfied that the allocations proposed would appropriately round off the village, and I am concerned that they would have a materially adverse effect on its setting in an important location. In the circumstances, I do not consider that the allocation of the sites for housing would be appropriate, or that their release has been properly justified in landscape terms. I prefer the allocation put forward in the proposed plan at Crail North (CRA 002), which I believe is in a less sensitive location.

20. Crail is a small coastal village. Local facilities and the village centre would be accessible by foot and cycling from the sites. I also note that there are potential footpath connections from both sites. Vehicular access to the sites would be possible from the A917. However, the proposed plan already makes reasonable provision for housing development within the village, and I consider the location of the sites proposed here to be inappropriate for the reasons set out above.

21. I acknowledge that there is a shortfall in meeting the housing land requirement in the SESEplan area of Fife together with the uncertainties expressed with regard to the level of that shortfall under Issue 2(b) Homes. However, the conclusions find that adequate housing land has been provided in the TAYplan area in line with requirements set out in the strategic development plan. In addition the 2015 Housing Land Audit has found that there is a 5 year effective housing land supply in both the Cupar and North West Fife and St Andrews and North East Fife Housing Market Areas. Accordingly, there is no strategic numerical justification to allocate further sites for housing within the TAYplan area. In any event, even if there was such a justification, I do not consider that this would outweigh the concerns I have about allocating these inappropriate extensions of the settlement. I also have concerns about the lack of any landscape justification for the proposed releases.

22. Overall, no adjustments are required to the proposed plan.

COUNTRYSIDE AREA

LWD 022: Crail Airfield

23. The former Crail Airfield is situated in countryside around 500 metres to the east of Crail on Balcomie Road, which divides the airfield in 2. It is the best preserved example of a Second World War Naval Airfield in Scotland, and contains several category A listed buildings and a scheduled ancient monument. Some of the buildings are in a poor state of repair. The site is currently used for outdoor events and employment purposes. The proposed plan allocates the site as an “other proposal”, and identifies a number of potentially suitable uses, which may include limited housing development, and various other types of development, such as the continuation of some outdoor events, and existing and new employment uses. The site is allocated in the adopted local plan for the same mix of uses. I note that a Proposal of Application Notice (ref: 14/03593) has been submitted for the site.

24. There is no dispute regarding the principle of development at Crail Airfield. Some representations suggest that development should be here in preference to the expansion of the village. I have concluded above that the allocation in the proposed plan at Crail North (CRA 002) would not undermine the village’s character, and that it would be
acceptable, subject to adjustments. Notwithstanding the historic importance of the former airfield, I am concerned about diverting development away from the village to this location. While the site is relatively close to the village, there is a clear physical and visual separation between them, and I am not persuaded that significant levels of development at the airfield, particularly the amount of housing proposed in the 2014 Development Concept Framework (up to 510 houses), would serve to complement and maintain the village’s character. It has also not been shown that this extent of housing would properly preserve the architectural and historic interest of the airfield. Furthermore, taking into account the broad development vision outlined in the framework, I am not satisfied that the wider sense of place existing in Crail could be provided at the airfield, and I consider that the separation between them could make it difficult to create an integrated community.

25. I have no doubt that significant financing is required if the site is to be properly restored, and I accept that this indicates that enabling development is required, which may involve housing. However, given the concerns I have outlined above, and the site’s out of settlement location in the countryside, I consider that the council is correct in stating in the proposed plan that the amount of housing on site should be limited. By its very nature, this type of proposal is complicated, and could take a lengthy period of time to come forward. As such, I do not consider that a large number of houses could be reasonably justified on the site on the grounds that they could be delivered promptly and help offset possible delays in bringing forward other housing allocations in the proposed plan, particularly the strategic land allocation at St Andrew’s West (which is consistent with TAYplan, and which I believe should be supported for the reasons given at Issue 16). I also note the conclusions at Issue 2(b) Homes that adequate housing land has been provided in the TAYplan in line with the requirements set out in the strategic development plan, and that there is a 5 year effective housing land supply in both the St Andrews and North East Fife and Cupar and North West Fife Housing Market Areas. There is therefore no strategic numerical justification to allocate further land for housing within the TAYplan area.

26. I agree with the council that if large numbers of houses are to be proposed on this site, a robust planning statement would be required which fully addressed the implications for the housing land supply. It would also be necessary to realistically and fully address the impacts on Crail, including the delivery of Crail North, and on the architectural and historic interest of the airfield. In all the circumstances, I cannot endorse the proposed removal of the restriction on housing on this site.

27. Overall, no adjustment is required to the proposed plan.

COUNTRYSIDE ISSUES

Non-inclusion of site: Sypsies, near Crail

28. The site is situated to the north west of Crail, south of the B940. It extends to around 0.5 hectares, and comprises part of a farm steading. The site is designated as countryside in the proposed plan, but was allocated for housing in the adopted local plan. Outline planning permission to form 12 residential units on site was granted on appeal in 2008 (ref: 06/04136/EOPP). The site was also covered by a planning permission in principle to form 12 dwellinghouses, which was granted in 2013 (ref: 12/00874/PPP), but it appears that permission expired in late June 2016. In response to the representation, the council indicated that the site could be included in
the proposed plan as a housing opportunity site.

29. FIR 104 sought further details on the possible inclusion of a housing site at Sypsies in the proposed plan. The representor responded by indicating that he would not be applying to renew the planning permission in principle, and that he no longer wished the site to be considered as an allocation for housing in the proposed plan. Instead, he now intended to pursue the use of the site as a wedding venue. In these new circumstances, I consider that the site should remain designated as countryside.

30. Overall, no adjustment is required to the proposed plan.

Reporter’s recommendations:

I recommend that the following modifications be made:

1. In reference CRA 002 (Crail North), page 51, delete the area given of 1 hectare and insert in its place, an area of “0.5” of a hectare.

2. In reference CRA 002 (Crail North), page 51, adjust the first paragraph of the additional development requirements so that it reads:

   “A revised Indicative Development Framework, setting out the principles to guide the development of the site, is to be prepared by the council in collaboration with landowners and/or developers. The community will be consulted on the revised development framework and its preparation.”

3. In reference CRA 002 (Crail North), page 51, delete the phrase “…shown on the Indicative Development Framework…” from the second sentence of the fourth paragraph of the additional development requirements so that it reads:

   “…High quality development and urban realm will be required, particularly along key building frontages…”

4. In reference CRA 002 (Crail North), page 51, add a new sentence at the end of the fifth paragraph of the additional development requirements to read:

   “…The local centre should not negatively impact on the vitality and viability of the village centre…”

5. In reference CRA 002 (Crail North), page 51, delete the figures and words “…5 (general industrial), 6 (storage and distribution)…” from the eighth paragraph of the additional development requirements so that it reads:

   “Employment land for Class 4 (business) to be an integral part of development.”

6. In reference CRA 002 (Crail North), page 51, adjust the first sentence of the ninth paragraph of the additional development requirements so that it reads:

   “The developer shall deliver a minimum of 0.5 hectares (net developable area) of serviced employment land (Class 4)…”
7. In reference CRA 002 (Crail North), page 51, insert a new paragraph between paragraphs 10 and 11 of the additional development requirements to read:

“The developer shall investigate the need for the on site provision of primary health care facilities.”
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**ELIE AND EARLSFERRY**

- P Brignal (245)
- S Bingham (310)
- P Brignal (1679)
- John Mackay (2292)

**EAE 001 (Land to the south of A917, East of Elie and Land to the North of Grange Road)**

- I Haxton (33)
- Andrew Simpson (140)
- Andrew Aitken (142)
- Campbell MacDougall (146)
- Chris Hanna (148)
- W J King (149)
- Derek Farmer (159)
- Robert and Christine Dingwall (162)
- John Drysdale (166)
- David Smart (189)
- Peter Forgie (190)
- Shaun Middleton (191)
- Richard Cowan (196)
- Robert Cumming (199)
- Susan Carnegie (200)
- Agnes Lind (201)
- David Wilson (211)
- Leonard Russell (214)
- Alan Robertson (222)
- Christopher & Barbara Mennie (223)
- David Simpson (224)
- Ann Johnson (225)
- P Brignal (245)
- Alexander A F Osbourne (247)
- Alexander Cowan (248)
- Sandra Carruthers (251)
- Gail Rollins (261)
- David and Alan Rodger (285)
- Rachel Fraser (286)
- Anne Riddle (287)
- Alistair Macnaughton (288)

**EAE 001 (Land to the south of A917, East of Elie and Land to the North of Grange Road) (cont)**

- Sharon Kemp (1220)
- Doreen Orr (1238)
- Lawrence Bell (1266)
- E Craig (1272)
- Richard Craig (1276)
- John Fingland (1281)
- Ronnie Hanna (1290)
- Morag Bell (1319)
- Christopher Roy (1352)
- Alan Lundie (1356)
- Alexander Terras (1371)
- Michael Dickson (1403, 1404)
- Mae Noble (1406)
- P Dickson (1441)
- L J Gilchrist (1444)
- Simon Malthouse (1490, 1527)
- Gordon Stevenson (1539)
- Ronald Oliver (1540)
- Alastair Dickson (1552)
- E Gilchrist (1568)
- Donald Thomson (1572)
- Iain Murdoch (1579)
- Robert Armour (1634)
- Rod Pow (1657)
- Martin Forbes (1665)
- P Brignal (1679)
- David Adams (1684)
- David Murdoch (1703)
- Douglas McNair (1761)
- Tom Gilchrist (1765)
- Olivia Howard (1797)
- James Carstairs (1924)
- Julie McLean (1948)
- Elie Estate (2074)
- Nicola Best (2109)
- Kirsten McKinnon (2139)
- Hilary Watt (2173)
- Robert Meacher (2278)
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<td>Sara Bishop (2797)</td>
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<td>George Morris (2940)</td>
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<td>Iain Dalglish (3017)</td>
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<td>A G Bannerman (3722)</td>
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<td>Keith MacLennan (3818)</td>
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**Provision of the development plan to which the issue relates:**

Settlement Plans (East Neuk): Elie and Earlsferry

**Planning authority’s summary of the representation(s):**

**ELIE AND EARLSFERRY**

**Elie & Earlsferry Issues**

John Mackay (2292): Elie Estates have identified other possible development sites on
the northern side of the village. These should be considered.

P Brignal (245, 1679): Consideration should instead be given to developing land behind Woodside Road which would have minimal impact.

S Bingham (310): Elie Estates own land at the back of Elie, a small area of which could be used for affordable housing.

**EAE 001 (Land to the south of A917, East of Elie and Land to the North of Grange Road)**

Note: Comments have been summarised into 3 categories:

- General representations, or those that do not refer specifically to one of the two sites comprising this proposal
- Representations relating to Land to the south of the A917, east of Elie
- Representations relating to Land to the north of Grange Road

**Principle of development of proposed sites**

Elie Estate (2074): Representation from site promoter in support of the proposed allocations. The key benefits are: Delivery of much needed Affordable Housing for local people; Support for Elie Primary School and local facilities; Delivery of a mixed use development at Wadeslea, providing premises for economic uses and employment opportunities for local people. The proposals also include potential for improved doctor surgery parking, increased amenity area with woodland planting and an enhanced connection to core paths. The results of the public consultation event in Jan 2014 and the recent statement by the Community Council suggest that there is support by the permanent resident population for the proposals. Elie Estate engaged landscape architects Optimised Environments (OPEN) to review the surrounding area for the most suitable areas for the longer term growth of the settlement and the proposed two sites were identified. Land at the Grange, although classified as class 3.1, has a particularly high sand content and is incapable of being cropped or used for any purpose other than as grazing land. Elie Estate is keen to work with Fife Council’s Transport Services to alleviate pressures. Statements in support of the proposals are attached.

Andrew Aitken (142), P Brignal (245, 964), Gail Rollins (261), S Bingham (310), D W Ferguson (702), Andrew Massie (700), John and Kathleen Barrie (705), John Cousins (822), Fiona MacLennan (821), Rosemary Burns (788), Duncan McCreath (819), Richard Craig (1276), Morag Bell (1319), Christopher Roy (1352), John Haswell Young (1147), Doreen Orr (1238), Alexander Terras (1371), Alastair Dickson (1552), Donald Thomson (1572), E Gilchrist (1568), Iain Murdoch (1579), Rod Pow (1578), Martin Forbes (1665), David Murdoch (1703), Mr and Mrs James Carstairs (1924), Nicola Best (2109), Kirsten McKinnon (2139), A G Bannerman (2668), Harry Murray (2722), Eva Muller-Allan (2731), Keith Geddes (2695), Nicola Clemence (2728), Stewart Bannerman (2802), Alastair Brown (3071): Object to proposal EAE 001.

Derek Farmer (159), Agnes Lind (201), P Brignal (245), David Peebles (306), David Smith (685), John and Kathleen Barrie (705), David Anderson (771), Thomas Somerville (791), Jenny Nicol (795), Deirdre Smith (800), Jim Craig (900), Thomas Strathearn (924), Nigel Scott (926), E Craig (1272), Michael Dickson (1404), P Dickson (1441), L J Gilchrist (1444), Alastair Dickson (1552), Douglas McNair (1761), Tom Gilchrist (1765),
PROPOSED FIFE LOCAL DEVELOPMENT PLAN

Julie McLean (1948), Robert Scott (2667), Niall Dickson (2792), A G Bannerman (3722): Object specifically to proposed development of land to south of the A917, East of Elie.

Andrews Simpson (140), Campbell MacDougall (146), Chris Hanna (148), W J King (149), Robert and Christine Dingwall (162), John Drysdale (166), David Smart (189), Peter Forgie (190), Shaun Middleton (191), Richard Cowan (196), Robert Cumming (199), Susan Carnegie (200), Agnes Lind (201), David Wilson (211), Leonard Russell (214), Alan Robertson (222), Christopher & Barbara Mennie (223), David Simpson (224), Ann Johnson (225), P Brignal (245), Alexander A F Osbourne (247), Alexander Cowan (248), Sandra Carruthers (251), Gail Rollins (261), David and Alan Rodger (285), Rachel Fraser (286), Anne Riddle (287), Alistair Macnaughton (288), George Shand (289), Pam Dinnie (290), David Peebles (306), S Bingham (310), Ann Wybar (337), Peter Kyle (392), W Neil Cuthbert (393), Bill Gow (394), Fiona Gow (395), Jenny Gilderdale (510), Alan Borthwick (567), Peter Rae (628), Robert A Lind (715), Douglas Macrae (722), Vincent Walker (729), C MacLennan (813), Fiona MacLennan (821), Rosemary Burns (888), M E M Waddell (870), Jim Craig (900), Graham Stevenson (939), Neil Burns (1215), Sharon Kemp (1220), E Craig (1272), John Fingland (1281), Ronnie Hanna (1290), Alan Lundie (1356), Michael Dickson (1403), Mae Noble (1406), P Dickson (1441), L J Gilchrist (1444), Simon Malthouse (1490, 1527), Gordon Stevenson (1539), Ronald Oliver (1540), Alastair Dickson (1552), Donald Thomson (1572), Robert Armour (1634), David Adams (1684), Douglas McNair (1761), Tom Gilchrist (1765), Olivia Howard (1797), Hilary Watt (2173), Sheila Souter (2291), Freda Osbourne (2391), Jean Glen (2402), J Scott Cochran (2407), James L Finlay (2622), David Syme (2624), Liz & Colin Carnie (2629), Diana Crichton (2630), John Stevenson (2644), Robert A Graham (2666), R M S Allison (2679), Brian Legatt (2683), William & Irene Cochran (2688), Leslie M Quinn (2689), Peter Nussey (2691), David Newton (2694), Bernard & Denise Burgin (2749), Jo Giddins (2753), Dorothy Parker (2762), James Laird (2763), Elaine Forgan (2768), Niall Dickson (2792), Sara Bishop (2797), George Morris (2940), Iain Dalglrish (3017), John Willoughby (3019), Keith MacLennan (3818): Object specifically to proposed development on land to north of Grange Road.

Andrews Simpson (140), Campbell MacDougall (146), Chris Hanna (148), Christine Dingwall (162), Peter Forgie (190), David Wilson (211), Alan Robertson (222), David Simpson (224), Alexander Andrew Fraser Osbourne (247), Alexander Cowan (248), Gail Rollins (261), Alistair Macnaughton (288), George Shand (289), David Peebles (306), W Neil Cuthbert (393), Bill Gow (394), Fiona Gow (395), Alan Borthwick (567), D W Ferguson (702), Robert A Lind (715), Douglas Macrae (722), Rosemary Burns (788), C MacLennan (813), Fiona MacLennan (821), Graham Stevenson (939), Neil Burns (1215), Sharon Kemp (1220), Ronnie Hanna (1290), Alan Lundie (1356), Michael Dickson (1403), P Dickson (1441), Simon Malthouse (1490), Gordon Stevenson (1539), David Adams (1684), Olivia Howard (1797), Freda Osbourne (2391), Jean Glen (2402), J Scott Cochran (2407), John Stevenson (2644), Brian Legatt (2683), Peter Nussey (2691), Jo Giddins (2753), James Laird (2763), Elaine Forgan (2768), John Willoughby (3019), Keith MacLennan (3818): Fife Council planning officers previously were not supportive of proposed development on land to north of Grange Road, highlighting issues relating to landscape, transportation, integration with the village, and relation to the East Neuk Community Action Plan. The changed status of the site is not justified.

Elie & Earlsferry Community Council (842): The Community Council, following a public presentation and Community Council meeting, notes that: the Community and the Community Council are divided on these matters; and, it would appear that there is a slight majority of permanent residents in favour of some development within the village.
General comments on the scale and location of development (General Representations, or Specific Site Not Specified)

Christine Dingwall (162), Shaun Middleton (191), Gail Rollins (261), Freda Osbourne (2391), James L Finlay (2622), Jo Giddins (2753), John Willoughby (3019): Consider it preferable to develop land to the East of Elie but not land to the North of Grange Road for one or more of the following reasons:

- The site is close to amenities in Elie.
- Development will include some affordable housing.
- The plan is to phase the development is such a way that it can be absorbed by the village.
- The character of the Wadeslea area is such that having previously been significantly developed, additional houses are unlikely to spoil the character of the village.
- Site is served by public transport.
- Site has egress onto a B class road with adequate pavements for pedestrians.

Sharon Kemp (1220), Ronnie Hanna (1290): Limited development to allow more affordable housing at land south of A917, east of Elie may be acceptable. Here it will be far more easily absorbed within the landscape; be more accessible to local services, shops and the bus route than land to the north of Grange Road. George and Kathleen Tait (707): Quality housing should be located on the southern end of the site.

E Gilchrist (1568), Iain Murdoch (1579), Martin Forbes (1665), Nicola Best (2109): Preference for a small (10 houses maximum) residential-only expansion, with a mixture of tenure, house size, layout and architecture.

Mr and Mrs James Carstairs (1924): A small number (25) of well-designed and carefully sited affordable houses may be acceptable if it can be guaranteed that they remain affordable in perpetuity.

Mr & Mrs Haxton (33): Limited development at the east end of the village, including general parking, additional community facilities and some social affordable housing for local resident occupation might be possible without spoiling all that is unique and precious to the village.

Morag Bell (1319): I agree with the ENCAP proposal but only up to a point. Some houses at Grange Road but only twelve, and some houses East of Elie from the surgery to the end of Wadeslea, similar to existing Council houses, and available to rent in perpetuity.

Robert A Graham (2666): The proposal is supported as it contains affordable housing. Elie requires more permanent residents to support the school and shops.

Robert Meacher (2278): Support some development of both the Grange Road and Wadeslea sites due to need for affordable houses. It is recognised that there are issues relating to second homes, local infrastructure, and protection of the environment. These developments could begin on a much smaller scale than what is currently being planned, taking into account the various comments and views of the community. Development could benefit the village; however, compromise needs to be made to ensure that the character of the community is not lost.
P Brignal (245), John Cousins (822): Development East of Elie should be no more than is included in the adopted Local Plan. What has changed since the examination report of the adopted Local Plan in 2012 which concluded that the wider area of development land identified by Elie Estates should not be supported?

P Brignal (245, 964), John Cousins (822), Doreen Orr (1238), Ronnie Hanna (1290), Donald Thomson (1572), Mr and Mrs James Carstairs (1924), Kirsten McKinnon (2139), John Mackay (2292), Diana Crichton (2630), Nicola Clemence (2728): Object to the scale of development proposed in Elie & Earlsferry. Scale of proposed development is greater than previous more organic growth.

Andrew Aitken (142): Fife Council planning officers previously were not supportive of this site. What has since changed?

John Cousins (822): Question why Fife Council now supports a proposal it described in a previous document as ‘more than would be supported by the Fife Plan Strategy.

General comments on the scale and location of development (Land to the South of the A917, East of Elie)

Duncan McCreath (819), P Dickson (1441), Robert Scott (2667), A G Bannerman (3722): Object to the scale of development proposed.

David Anderson (771), P Dickson (1441), John Mackay (2292): Development would accentuate ribbon development along the coast.

Derek Farmer (159), Alexander Terras (1371), P Dickson (1441): Concern that the area is not suitable for new housing development for one or more the following reasons:

- Development should be directed to larger urban centres with better infrastructure.
- There are not adequate employment opportunities locally to support new housing.
- Transport links to urban areas are limited.

General comments on the scale and location of development (Land to north of Grange Road)

Ronnie Hanna (1290), Douglas McNair (1761): Considers that the proposal is contrary to Scottish Planning Policy, TAYplan and the policies of the Proposed FIFEplan. Mr Ronnie Hanna (1290): Proposal does not meet the aims and objectives, or the location principles set out in TAYplan. Mr Ronnie Hanna (1290): Submitted statements on Planning Policy, Landscape, Transport and Viability support these conclusions.

David Simpson (224), Ann Wybar (337), David Adams (1684): Scale of development is excessive and is not supported by the FIFEplan strategy.

Campbell MacDougall (146), Christine Dingwall (162), John Drysdale (166), David Smart (189), Peter Forgie (190), Shaun Middleton (191), Richard Cowan (196), Susan Carnegie (200), Agnes Lind (201), David Wilson (211), Dr Alan Robertson (222), Christopher & Barbara Mennie (223), David Simpson (224), Ann Johnson (225), Alexander Andrew Fraser Osbourne (247), Alexander Cowan (248), Gail Rollins (261), David and Alan Rodger (285), Alistair Macnaughton (288), David Peebles (306), Ann Wybar (337), W Neil Cuthbert (393), Bill Gow (394), Fiona Gow (395), Jenny Gilderdale
The site is remote from shops, services, facilities and infrastructure. The location is unsustainable. The golf course separates the site from the rest of the village. Development will be reliant on car use.

Concern that more than 25 houses will be built. Some representations note the large size of the field, and predict that development density is likely to increase.

Development may increase the probability of further additional development to the north in future. There is no natural containment.

Has an assessment been made to determine whether there are more suitable sites within the village?

Brownfield land should be used in advance of green field sites.

Development will have a negative impact on the landscape, townscape, views, and the character of the village, including one or more of the following:
- Development would negatively impact on the beautiful village of Elie and Earlsferry.
- Elie is a conservation village and area of outstanding natural beauty.
- Current scenic views will be replaced by housing estates and industrial units.
- Development would damage the spectacular views from the Fife Coastal Path.
- Traffic lights, roundabouts and signs will be needed, causing urbanisation.
- Development could impact on what is a small, rural, close-knit community.
- Estates of modern housing would detract from the architectural uniqueness of the village.
- Elie and Earlsferry function well and should remain as they are currently.

Landscape, townscape, views and character (Land to the South of the A917, East of Elie)

Derek Farmer (159), David Smith (685), David Anderson (771), John Cousins (822), Duncan McCreath (819), Jim Craig (900), John H Young (1147), Michael Dickson (1404), P Dickson (1441), L J Gilchrist (1444), Ronald Oliver (1540), Alastair Dickson (1552), Julie McLean (1948), Kirsten McKinnon (2139), Robert Scott (2667), R M S Allison (2679), Niall Dickson (2792), A G Bannerman (3722): Concerns that development will have a negative impact on the landscape, views, and the character of the village, including one or more the following:

- Impact on the setting of Ruby Bay, the lighthouse and the Ladies Tower.
- Development likely to detract from the setting of the conservation area, and the character and amenity of the village.
- Impact on the seascape.
- Concern over loss of sea views, and views of the village from the coastal path.
- Concern over impact on views from the A917 to Ruby Bay, the Lady’s Tower and the lighthouse.
- Object to loss of green space.
- Impact on unique character of Elie; a small historic village.

Ronald Oliver (1540): The Council should consider a design competition, underwritten by the developer, given the wide recognition of the attractiveness of the East Neuk.

Landscape, townscape, views and character (Land to north of Grange Road)

Andrews Simpson (140), Campbell MacDougall (146), Chris Hanna (148), W J King (149), Christine Dingwall (162), John Drysdale (166), David Smart (189), Peter Forgie (190), Shaun Middleton (191), Richard Cowan (196), Robert Cumming (199), Susan Carnegie (200), David Wilson (211), Leonard Russell (214), Alan Robertson (222), Christopher & Barbara Mennie (223), David Simpson (224), Ann Johnson (225), Alexander Andrew Fraser Osbourne (247), Alexander Cowan (248), Gail Rollins (261), David and Alan Rodger (285), Rachel Fraser (286), Alistair Macnaughton (288), George Shand (289), Pam Dippie (290), B M Sinclair (297), David Peebles (306), Ann Wybar (337), W Neil Cuthbert (393), Bill Gow (394), Fiona Gow (395), Jenny Gilderdale (510), Alan Borthwick (567), Peter Rae (628), D W Ferguson (702), Robert A Lind (715), Douglas Macrae (722), Vincent Walker (729), Rosemary Burns (788), C MacLennan (813), Duncan McCrea (819), Graham Stevenson (939), Graham Stevenson (939), Neil Burns (1215), Sharon Kemp (1220), E Craig (1272), Richard Craig (1276), John Fin gland (1281), Ronnie Hanna (1290), Alan Lundie (1356), Michael Dickson (1403), Mae Noble (1406), P Dickson (1441), L J Gilchrist (1444), Simon Malthouse (1490, 1527), Gordon Stevenson (1539), Ronald Oliver (1540), Alastair Dickson (1552), Robert Armour (1634), David Adams (1684), Olivia Howard (1797), Hilary Watt (2173), Kirsten McKinnon (2139), Sheila Souter (2291), Freda Osbourne (2391), Jean Glen (2402), J Scott Cochran (2407), Liz & Colin Carnie (2629), Diana Crichton (2630), John Stevenson (2644), Robert A Graham (2666), Brian Leggat (2683), William & Irene Cochran (2688), Leslie M Quinn (2689), Peter Nussey (2691), Jo Giddins (2753), James
Laird (2763), Dorothy Parker (2762), Niall Dickson (2792), Sara Bishop (2797), George Morris (2940), Iain Dalgliesh (3017), John Willoughby (3019), Keith MacLennan (3818): Concerns that development will have a negative impact on the landscape, views, skyline and character of the village including one or more the following:
- Site is within a designated landscape area.
- The site sits in an attractive landscape which should be protected.
- Development will alter rural character of the area.
- Earlsferry is a conservation village/impact on conservation area.
- The village is well known for its scenic beauty, historic character and views.
- Views from the north, over the Forth, from the coast, and around the golf course, should be protected.
- Grange Road is the natural boundary of Earlsferry and creates a scenic arrival.
- Grange Road has an interesting mix of high quality houses which are a landmark for the village.
- Development would be on the ridge of the hill and would break the skyline.
- Concern over the visual impact of a group of modern or standard house types with street lighting.
- The site is outside and peripheral to the village. A new separate village will be created.
- The site is an important part of the amenity of Earlsferry.
- Proposed development is not in keeping with the pattern of existing development.
- The sketch proposal would provide a more severe edge to Earlsferry.
- Development would curtail distant views which are a feature of this landscape.
- Object to development in greenbelt.
- Additional infrastructure and traffic will further impact upon the character of the area.

Ronald Oliver (1540): If the local authority is minded to support these proposals then there should be a detailed and robust design brief. The Council should consider a design competition, the results of which would be legally enforceable, to achieve a design capable of enhancing the Earlsferry area. Development should be undertaken in stages. A strong tree-belt along the countryside boundaries should be completed in advance of development.

Mr & Mrs Haxton (33): This is a high profile site in a prominent location. Development should be high quality, low rise detached units of mixed design, and low density. Plots should not be sold on an individual basis to allow a harmonious and timeous development by an established national housebuilder.

Transport (General Representations, or Specific Site Not Specified)

Mr & Mrs Haxton (33), Andrew Aitken (142), Gail Rollins (261), B M Sinclair (297), S Bingham (310), Andrew Massie (700), D W Ferguson (702), John and Kathleen Barrie (705), George and Kathleen Tait (707), John Cousins (822), Rosemary Burns (788), John Haswell Young (1147), Richard Craig (1276), Alastair Dickson (1552), Donald Thomson (1572), Rod Pow (1657), Douglas McNair (1761), Tom Gilchrist (1765), Mr & Mrs James Carstairs (1924), Kirsten McKinnon (2139), Eva Muller-Allan (2731), Keith Geddes (2695), Harry Murray (2722), Alastair Brown (3071): Concern about traffic issues, including one or more the following:
- Increased car use will increase traffic and increase safety risk.
- Road network (within Elie and Earlsferry, and the wider East Neuk area) is inadequate to support additional development.
- Roads within the village are narrow.
- The village is poorly served by public transport.
- Additional traffic would reduce the freedom of children to walk and cycle in the area.
- Existing parking issues will be exacerbated.
- Due to limited shops, facilities and employment opportunities locally, traffic on main roads to urban areas will increase.
- Junctions at Wadeslea and Ferry Road are dangerous.
- The location of the sites will exacerbate car usage.

**Transport (Land to the South of the A917, East of Elie)**

Derek Farmer (159), Agnes Lind (201), David Smith (685), David Anderson (771), Thomas Somerville (791), Jenny Nicol (795), Deirdre Smith (800), Duncan McCreath (819), Jim Craig (900), Thomas Strathearn (924), Christopher Roy (1352), John H Young (1147), E Craig (1272), P Dickson (1441), L J Gilchrist (1444), Ronald Oliver (1540), Alastair Dickson (1552), E Gilchrist (1568), Donald Thomson (1572), Iain Murdoch (1579), Martin Forbes (1665), David Murdoch (1703), Nicola Best (2109), John Mackay (2292), Robert Scott (2667), R M S Allison (2679), Nicola Clemence (2728), Alastair Brown (3071), A G Bannerman (3722): Concern about traffic issues, including one or more the following:

- Road network is inadequate to support additional development.
- Existing parking issues will be exacerbated.
- The surgery does not have adequate parking.
- Increased car use will increase safety risk.
- Development will exacerbate problems at the Wadeslea/High St/North St junction, which is already dangerous due to visibility issues, narrow road on the High St, and the old bridge to the east. Junction of A917 and Baird Place is also dangerous.
- Wadeslea is busy with traffic to Ruby Bay, especially in summer.
- Baird Place is inadequate for additional traffic. It is narrow, has parking problems and suffers from subsidence.
- Concerns about long travel to work times and poor/infrequent public transport.
- Concern about the impact of construction traffic.
- Baird Place is a cul-de-sac which provides a safe haven for children.
- Access will be required to the front and rear of properties at 14/22 Baird Place by emergency services.

Mr & Mrs Haxton (33): Additional parking in general and in particular for the doctors surgery would be most welcome.

**Transport (Land to north of Grange Road)**

Mr & Mrs Haxton (33), Andrews Simpson (140), Campbell MacDougall (146), Chris Hanna (148), W J King (149), Christine Dingwall (162), John Drysdale (166), David Smart (189), Peter Forgie (190), Richard Cowan (196), Robert Cumming (199), Susan Carnegie (200), Agnes Lind (201), David Wilson (211), Leonard Russell (214), Alan Robertson (222), Christopher & Barbara Mennie (223), David Simpson (224), Ann Johnson (225), Alexander A F Osbourne (247), Alexander Cowan (248), Sandra Carruthers (251), Gail Rollins (261), David and Alan Rodger (285), Rachel Fraser (286), Anne Riddle (287), Alistair Macnaughton (288), George Shand (289), Pam Dippie (290), B M Sinclair (297), David Peebles (306), Peter Kyle (392), W Neil Cuthbert (393), Bill
Concern about traffic issues, including one or more of the following:

- Increased car use will increase safety risk.
- Roads adjoining the site are narrow and inadequate for additional traffic.
- There are no footpaths along Ferry Road.
- Area is popular with children, walkers, joggers, cyclists, horse-riders and the elderly.
- Additional traffic would reduce the freedom of children to walk and cycle in the area.
- Junctions at Links Road, Grange Road, Earlsferry High St and Ferry Road are busy and/or hazardous.
- Existing parking issues will be exacerbated, particularly during peak periods.
- Site poorly served by public transport. The bus service no longer serves Earlsferry.
- Roads would have to be adopted, and made into a one-way system.
- There are bad sight lines on the roads.
- Small bridge at St Ford farm is a blind summit and may not be suitable for increased traffic.
- Narrow streets and parking create issues for the emergency services and larger vehicles.
- Bridges on Ferry Road narrow and possibly weak.
- There are problems with speeding on Ferry Road.
- Road widening would destroy the nature of what is a country lane.
- Site does not conform to Designing Streets.
- It is understood that there are land ownership constraints regarding the proposal to upgrade the farm road to the north of the site.
- Where would a cycle route within the site lead to?
- The original site assessment concluded that only one access to the Q29 road was possible.
- Fife Council must commit to major road improvements and have an agreement to acquire part of the golf course to allow road widening.
- Land for road widening and new pavements is owned by the Golf House Club. Compulsory purchase and demolition of property would be required at the High St/Links Place junction.
- Who would maintain new or upgraded roads?
- It is essential that a survey is carried out during peak months (July-August).
- There is a right of way between the houses of Newlands and Seawinds on Grange Road. This will become a short cut and due to the narrowness of the alleyway it would need to be closed or new ground made available.

Environment (General Representations, or Specific Site Not Specified)

Andrew Aitken (142): Development will increase light pollution.

Andrew Aitken (142), John and Kathleen Barrie (705), John Haswell Young (1147), Tom Gilchrist (1765): Development will result in the loss of prime agricultural land.

Robert Meacher (2278): The fauna and flora needs considered as well in a balanced approach which will benefit us all.

Environment (Land to the South of the A917, East of Elie)

Derek Farmer (159), Agnes Lind (201), John and Kathleen Barrie (705), George and Kathleen Tait (707), Robert A Lind (715), David Anderson (771), Thomas Somerville (791), Jenny Nicol (795), Deirdre Smith (800), Duncan McCreath (819), Jim Craig (900), Christopher Roy (1352), John H Young (1147), Alexander Terras (1371), P Dickson (1441), L J Gilchrist (1444), E Gilchrist (1568), Iain Murdoch (1579), Rod Pow (1657), Martin Forbes (1665), Nicola Best (2109), Nicola Clemence (2728): Concerns that development will have a negative impact on the natural environment for one or more the following reasons:

- Field supports large numbers of birds, small animals and insects e.g. buzzards, curlews, plovers, oystercatchers, lapwings, starlings, finches, herons, buntings, goldfinches, sparrow hawks, pheasants. Many of these are rare species.
- The RSPB have worked with Ardross Farm to monitor and protect the bird life, particularly in the site of the Old Wall Foundations that run from Wadeslea eastwards. Ornithologists regularly visit Baird Place.
- The East side of development would impinge on the shore zone (250m from high tide) adversely affecting various bird species. An ecological survey of the surrounding area is recommended.

George and Kathleen Tait (707), Thomas Strathearn (924), E Craig (1272), Alexander Terras (1371), P Dickson (1441), L J Gilchrist (1444), E Gilchrist (1568), Iain Murdoch (1579), Martin Forbes (1665), Nicola Best (2109): Object to loss of agricultural land.

E Gilchrist (1568), Iain Murdoch (1579), Martin Forbes (1665), Nicola Best (2109): The Wadeslea site may be at risk of land-slides/coastal erosion.

Derek Farmer (159): Development will restrict future potential relocation of the Coastal Path should this be needed as a result of erosion and climate change.

Environment (Land to north of Grange Road)

Vincent Walker (729), Dr Jim Craig (900), Diana Crichton (2630): Concerns that development will have a negative impact on natural heritage for one or more the following reasons:

- The area provides a feeding/resting ground for migratory birds.
Impact on wildlife in the shore zone and nearby woods. An ecological survey of the surrounding area is recommended.

Campbell MacDougall (146), Christine Dingwall (162), David Smart (189), Peter Forgie (190), Richard Cowan (196), Susan Carnegie (200), David Wilson (211), Christopher & Barbara Mennie (223), Ann Johnson (225), Alexander Andrew Fraser Osbourne (247), Alexander Cowan (248), Gail Rollins (261), David and Alan Rodger (285), Alistair Macnaughton (288), George Shand (289), David Peebles (306), W Neil Cuthbert (393), Bill Gow (394), Fiona Gow (395), Jenny Gilderdale (510), Peter Rae (628), D W Ferguson (702), Robert A Lind (715), Douglas Macrae (722), Vincent Walker (729), C MacLennan (813), Neil Burns (1215), Sharon Kemp (1220), E Craig (1272), John Fingland (1281), Ronnie Hanna (1290), Alan Lundie (1356), Michael Dickson (1403), P Dickson (1441), Dr Simon Malthouse (1490, 1527), Robert Armour (1634), Olivia Howard (1797), Sheila Souter (2291), Freda Osbourne (2391), J Scott Cochran (2407), Diana Crichton (2630), Robert A Graham (2666), R M S Allison (2679), Brian Leggat (2683), Leslie M Quinn (2689), David Newton (2694), Jo Giddins (2753), Elaine Forgan (2768), Sara Bishop (2797), Iain Dalglish (3017), Keith MacLennan (3818): Object to the loss of agricultural land.

Robert Cumming (199), Susan Carnegie (200), Vincent Walker (729), J Scott Cochran (2407): Development will result in light pollution in a location where there are currently no streetlights.

Economy (General Representations, or Specific Site Not Specified)

P Brignal (245), S Bingham (310), John and Kathleen Barrie (705), George and Kathleen Tait (707), Rosemary Burns (788), John H Young (1147), Richard Craig (1276), Alexander Terras (1371), E Gilchrist (1568), Donald Thomson (1572), Iain Murdoch (1579), Martin Forbes (1665), David Murdoch (1703), Mr and Mrs James Carstairs (1924), Nicola Best (2109), Kirsten McKinnon (2139), Keith Geddes (2695), George Morris (2940): Development will have a negative impact on tourism for one or more of the following reasons:
- Over-development of the village will spoil a renowned tourist attraction.
- Small village atmosphere and beautiful coastal scenery are a key attraction.
- Elie and Earlsferry are jewels in the crown of the East Neuk of Fife.
- The local economy relies on tourism.

P Brignal (245): Visitors and holiday makers are more likely to support local shops and the leisure industry than new residents, and should not be deterred from visiting. Elie and Earlsferry’s shops and bank are standing up better than other villages.

Donald Thomson (1572), Tom Gilchrist (1765), Mr and Mrs James Carstairs (1924), Eva Muller-Allan (2731): The provision of new housing will not halt the loss of local shops and services or increase commercial activity, which is the result of wider policies and trends.

Mr P Brignal (245): Money could be better spent giving grants to local hotels.

Economy (Land to the South of the A917, East of Elie)

Derek Farmer (159), Agnes Lind (201), David Smith (685), David Anderson (771),
Thomas Somerville (791), Jenny Nicol (795), Deirdre Smith (800), E Craig (1272), Alastair Dickson (1552), Rod Pow (1657), Julie McLean (1948): Development will have a negative impact on visitors and tourism for one or more the following reasons:

- Development will spoil a renowned tourist attraction.
- Development will have a negative impact on the Fife Coastal Path
- Impact on Ruby Bay, which is popular for tourism and recreation.
- Development will obscure coastal attractions as viewed from the A917.
- The coastline should be preserved.
- The local economy relies on tourism.
- Negative impact on bed and breakfast premises at 29 Wadeslea due to loss of views, and impact on peace and tranquillity.

Economy (Land to north of Grange Road)

W J King (149), John Drysdale (166), David Smart (189), Richard Cowan (196), Dr Alan Robertson (222), David and Alan Rodger (285), Anne Riddle (287), Jenny Gilderdale (510), Robert A Lind (715), Vincent Walker (729), Graham Stevenson (939), E Craig (1272), Olivia Howard (1797), Hilary Watt (2173): Development will impact on the attractiveness of the area as a tourist destination and will deter visitors from visiting the village.

Employment Land (Land to the South of the A917, East of Elie)

Mr & Mrs Haxton (33), P Brignal (245, 964, 1679), S Bingham (310), John and Kathleen Barrie (705), Thomas Somerville (791), Jenny Nicol (795), Deirdre Smith (800), Duncan McCreath (819), Richard Craig (1276), Alexander Terras (1371), P Dickson (1441), L J Gilchrist (1444), Ronald Oliver (1540), Alastair Dickson (1552), E Gilchrist (1568), Iain Murdoch (1579), Rod Pow (1657), Martin Forbes (1665), David Murdoch (1703), Julie McLean (1948), Nicola Best (2109), Robert Scott (2667), Alastair Brown (3071), A G Bannerman (3722): Concern about provision of employment land, including one or more the following:

- Concerns about mixing business units with residential due to road and safety issues.
- Most local tradesmen already have their own premises.
- Light industry units will impinge on the residential character of Wadeslea.
- Narrow roads and hazardous junctions cannot cope with more large vehicles.
- Long journey times to major urban areas are likely to deter businesses.
- Concern over lack of demand for business units. Many have been converted to residential in the village. There are empty commercial properties within a short drive time from Elie, and further afield in Leven and Kirkcaldy.
- Unoccupied units can be a source of troublesome negative amenity.
- The small business units should be located north of the A917 near the South Lodge of Elie Estates where they were sited in an earlier proposal, giving separation from housing.
- It is unclear what type of employment units might offer
- May have a negative impact on Elie High Street through additional competition.
- Industrial units will have a negative impact on tourism, and are unnecessary near the coastline.
- Elie does not need industrial units. It is a tourist village.
E Gilchrist (1568), Iain Murdoch (1579), Martin Forbes (1665), David Murdoch (1703), Nicola Best (2109); Class 4/business units should be located on the eastern fringe of the site, minimising traffic impact on Wadeslea.

George and Kathleen Tait (707): The Small Business Units should be located on the North Side of the A917 near the South Lodge of Elie Estates where they were sited in an earlier proposal, giving a natural separation from any Domestic Housing.

David Anderson (771): Development is not accompanied by generation of appropriate employment opportunities in the local area for proposed occupants.

Retail (Land to the South of the A917, East of Elie)

Mr & Mrs Haxton (33), S Bingham (310), Jim Craig (900), Doreen Orr (1238), E Craig (1272), Alexander Terras (1371), E Gilchrist (1568), Iain Murdoch (1579), Rod Pow (1657), Martin Forbes (1665), David Murdoch (1703), Julie McLean (1948), Nicola Best (2109), Kirsten McKinnon (2139): Concern about provision of retail uses:

- May impact on local shops on Elie High Street.
- Existing retail in Elie could cope with any uplift in trade.
- May harm character of the village.
- Question need or demand in the local area.
- Contravenes national planning policy.

Infrastructure and services (General Representations, or Specific Site Not Specified)

Mr & Mrs Haxton (33), Andrew Aitken (142), P Brignal (245), S Bingham (310), John and Kathleen Barrie (705), George and Kathleen Tait (707), Richard Craig (1276), Alexander Terras (1371), Alastair Dickson (1552), E Gilchrist (1568), Iain Murdoch (1579), Rod Pow (1657), Martin Forbes (1665), Tom Gilchrist (1765), Mr and Mrs James Carstairs (1924), Nicola Best (2109), John Mackay (2292), Eva Muller-Allan (2731), Alastair Brown (3071): Concern over impacts on local services and infrastructure generally, and more specifically including one or more the following:

- The sewerage system is already overloaded, with potential negative impacts for the award winning blue flag beaches.
- Sewage is currently discharged untreated into the sea. Treatment works are needed.
- The golf course, beach and harbour are already used to capacity.
- There is no evidence that new homes will help the local school, as homes may not attract young families with children.
- Lighting and roads would need to be upgraded, particularly in the Grange Road area.
- Development would put the local surgery under pressure, where parking is already inadequate.
- Local shopping facilities are inadequate to service additional population.

Infrastructure and services (Land to the South of the A917, East of Elie)

Agnes Lind (201), David Smith (685), David Anderson (771), Thomas Somerville (791), Jenny Nicol (795), Deirdre Smith (800), Jim Craig (900), Thomas Strathearn (924), E Craig (1272), Christopher Roy (1352), Alexander Terras (1371), Michael Dickson (1404),
P Dickson (1441), Ronald Oliver (1540): Concerns that local infrastructure will not be able to cope with development for one or more the following reasons:

- Development will increase pressure on the surgery, which would have to be expanded.
- Power cuts are frequent in the area.
- Water supply issues.
- Impact on telephone system, broadband speed and mobile signal.
- Potential problems with sewage and drainage infrastructure, with potential negative impacts for the award winning blue flag beach. Blockages are common in summer.
- Particular issues highlighted in Baird Place area.
- These problems should be addressed early in the process.

Mr & Mrs Haxton (33): The provision of community space and facilities is welcomed.

Infrastructure and services  (Land to north of Grange Road)

Robert Cumming (199), Agnes Lind (201), Sandra Carruthers (251), David & Alan Rodger (285), Robert A Lind (715), Fiona MacLennan (821), M E M Waddell (870), Jim Craig (900), Graham Stevenson (939), Neil Burns (1215), E Craig (1272), John Fingland (1281), Michael Dickson (1403), Mae Noble (1406), L J Gilchrist (1444), Ronald Oliver (1540), David Adams (1684), Sheila Souter (2291), John Stevenson (2644), William & Irene Cochran (2688), Peter Nussey (2691), George Morris (2940): Concern that local infrastructure and services will not be able to cope with development, including one or more the following:

- There have been issues with the power supply in the village.
- Drainage and sewage infrastructure unable to cope with more houses.
- Telephone infrastructure is under pressure.
- Water supply issues. There are problems with water pressure around the Grangehill area and the east of the village.
- Potential drainage and sewerage issues. Earlsferry has frequent blockages.
- The doctors surgery will not be able to cope with additional patients.
- The village does not have the amenities to cope with additional housing.
- School has limited capacity.

Amenity (General Representations, or Specific Site Not Specified)

Andrew Massie (700): Concerns that development will have a negative impact on the amenity of existing residents for one or more the following reasons:

- Loss of views.
- Negative impact on house prices.
- Long timescales and phased nature of development would blight amenity and property prices for decades.
- Objection to using playing fields.

P Brignal (1679): Don't want to live next to a housing estate or industrial area.

Amenity (Land to the South of the A917, East of Elie)

Derek Farmer (159), Jenny Gilderdale (510), David Anderson (771), E Craig (1272), John Mackay (2292): Concerns that development will have a negative impact on the
amenity of existing residents for one or more the following reasons:

- Loss of views and visual amenity, including properties adjacent to proposed development.
- Development could involve the construction of an access road cutting across existing dwellings.
- Development will adversely affect an area popular with residents for recreational use.
- Noise and disruption during construction.

**Amenity (Land to north of Grange Road)**

Jean Glen (2402), Diana Crichton (2630), Dorothy Parker (2762): Concerns over loss of amenity, including one or more of the following:

- Loss of amenity for properties immediately adjacent to proposed development.
- The site would overlook adjacent buildings as it is on higher ground.
- Significant increase in noise disturbance, especially at closing time at the local pub.

**Housing/Affordable housing issues (General Representations, or Specific Site Not Specified)**

B M Sinclair (297), S Bingham (310), John Cousins (822), Ronald Oliver (1540), E Gilchrist (1568), Iain Murdoch (1579), Rod Pow (1657), Martin Forbes (1665), Tom Gilchrist (1765), Mr and Mrs James Carstairs (1924), Nicola Best (2109), Kirsten McKinnon (2139): Concern that a large proportion of new housing will be second-homes or holiday homes, with no benefit to the village. What assurance is there that a significant proportion of housing would make a lasting contribution to housing local people at an affordable level? Houses away from the coast would be less attractive as holiday homes. Control of the occupation of proposed housing units is needed.

Elie & Earlsferry Community Council (842): Provision of owner/occupier homes is likely to fail to benefit the village as the majority will be used as holiday homes. If there is development a higher proportion of homes should be affordable than currently planned for.

B M Sinclair (297), Duncan McCreath (819): Recognise a need for more affordable housing.

Robert Meacher (2278): There is a real need for affordable houses for rent in the village. There are only a limited number of council houses available and private rentals are highly priced and generally poorly maintained. House prices make it near impossible for locals to be able to afford to buy a home. Preference for a clause to force purchasers of new homes to use these as their primary residence.

Robert Scott (2667): Social housing is needed in the village but should be achieved by the use of infill sites.

Nicola Clemence (2728): Segregation of affordable housing between the two sites will lead to a division in the village. The social/affordable housing provision should be mixed across both sites, with reduced numbers in both areas.
George Morris (2940): Welcome social housing development, but not executive housing. The villages are not balanced communities and non-social housing will increase the problem.

Donald Thomson (1572): Disagrees that the provision of a large element of market housing is required to make the delivery of affordable housing feasible.

Graham Stevenson (939): Question the need for affordable housing given the lack of employment opportunities.

Eva Muller-Allan (2731): Affordable houses are likely to be sold on after a few years for profit and will not remain affordable.

Alastair Brown (3071): No guarantee that affordable homes will go to those for whom they are intended.

P Brignal (245, 1679), Ronald Oliver (1540): Why provide low cost housing where employment opportunities are limited? Social and affordable housing should be provided near to areas of high employment. There could be a contribution towards affordable housing in a more suitable area.

Andrew Massie (700), Doreen Orr (1238), Michael Dickson (1404), Kirsten McKinnon (2139): No need for additional housing in the area has been demonstrated.

Fiona MacLennan (821): There are more families coming to live permanently in the village which keeps the village alive without more new housing.

Graham Stevenson (939): More property owners whose main residence is not in the village are spending more time in the village.

Housing/Affordable housing issues (Land to the South of the A917, East of Elie)

Mr & Mrs Haxton (33), Derek Farmer (159), David Anderson (771), Nigel Scott (926), Julie McLean (1948): Concern that a large proportion of new housing will be second-homes or holiday homes, to the detriment of the village. Particularly if there are not local employment opportunities for new housing. Low occupancy of housing in the village has caused a deterioration of shops and services.

Nigel Scott (926): Housing for sale should have a covenant in the deeds preventing use as holiday homes. If safeguards are put in place to prevent absentee ownership of new housing I would withdraw my objection.

John and Kathleen Barrie (705): Quality housing should be located on the southern end of the site to retain sea-views over fields.

David Anderson (771): With 50-60% of housing in Elie and Earnsferry already second/holiday homes, existing housing stock is under-utilised.

Agnes Lind (201): Is there any guarantee that proposed affordable houses will be sold to young families?

Mr & Mrs Haxton (33): The development criteria and network priorities for land to the East of Elie are in principle wholly appropriate on the basis of a mix of high quality low
Housing/Affordable housing issues (Land to north of Grange Road)

Anne Riddle (287), Dr Peter Kyle (392), Fiona MacLennan (821), Graham Stevenson (939), Neil Burns (1215), Ronald Oliver (1540), Liz & Colin Carnie (2629), John Stevenson (2644), Robert A Graham (2666): Concern that a large proportion of new housing will be second-homes or holiday homes, with no benefit to the village. Low density, high value homes are likely to appeal to the market at land north of the Grange.

Mae Noble (1406), Ronald Oliver (1540): More affordable, family housing is needed. Due to the location and density of development, new housing will be aimed at the upper end of the housing market and preclude mainstream family housing.

Vincent Walker (729), Graham Stevenson (939), Michael Dickson (1403), Gordon Stevenson (1539), Ronald Oliver (1540): The need for more housing in the village has not been justified.

Ronnie Hanna (1290): The current allocation for 20 houses on site EAE 01 South of Health Centre remains undeveloped raising questions regarding the demand for and delivery of new housing in the village.

Miscellaneous (General Representations, or Specific Site Not Specified)

Morag Bell (1319): Land beyond Baird Place is ideal for a much needed cemetery for the village.

Lawrence Bell (1266): When Kilconquhar Cemetery becomes full Elie will need one of its own, perhaps East of Elie.

Vincent Walker (729), C MacLennan (813), John Cousins (822), Alastair Dickson (1552), P Brignal (1679), David Adams (1684), Eva Muller-Allan (2731), R M S Allison (2679), Alastair Brown (3071): The views of the Community Council have not adequately captured views of the local community. Many people who attended a meeting about the proposals had to be turned away due to overcrowding, and there is therefore a concern that the meeting may not have reflected the views in the village.

P Brignal (1679): What is the point of spending millions of pounds of Council Tax payer's money to produce this Fife Plan which people use to plan their lives, then change it after a few years.

John Cousins (822), John Mackay (2292): Local views have not been sought. The proposals have not been subject to an appropriate level of consideration and public scrutiny.

P Dickson (1441), David Adams (1684): The East Neuk Community Action Plan is not in the public domain, has not been consulted on, and should therefore not be considered in this process.

SEPA (3399): Support the inclusion of a requirement for high quality SUDS, and that no
diffuse urban run-off will enter the receiving bathing waters. The receiving watercourse has been identified as being sensitive and has limited capacity to dilute surface water run-off.

**Miscellaneous (Land to north of Grange Road)**

Graham Stevenson (939), Gordon Stevenson (1539), Ronald Oliver (1540): The site has old mine workings which may increase development cost and risk.

Campbell MacDougall (146), Christine Dingwall (162), Richard Cowan (196), Susan Carnegie (200), David Wilson (211), Alexander Cowan (248), George Shand (289), B M Sinclair (297), Bill Gow (394), Fiona Gow (395), D W Ferguson (702), Douglas Macrae (722), Fiona MacLennan (821), Rosemary Burns (788), Graham Stevenson (939), Ronnie Hanna (1290), Michael Dickson (1403), Mae Noble (1406), P Dickson (1441), Gordon Stevenson (1539), Robert Armour (1634), J Scott Cochran (2407), Diana Crichton (2630), Brian Leggat (2683), William & Irene Cochran (2688), Peter Nussey (2691), David Newton (2694), Elaine Forgan (2768), Iain Dalglish (3017), Alastair Brown (3071): Development of this site is not necessary to deliver land South of the A917, East of Elie. The sites should be considered separately.

Ronnie Hanna (1290): A Viability Assessment (submitted) demonstrates that the proposed development within EAE 001 to the south of A917 is viable in its own right, and does not need to be cross subsidised by higher value development to the north of Grange Road.

Graham Stevenson (939): Concern over what would happen if the developer goes bankrupt during construction.

**Modifications sought by those submitting representations:**

**Elie & Earlsferry Issues**

John Mackay (2292), P Brignal (245, 1679), S Bingham (310): Delete proposed development sites and consider re-allocation to the north of Elie.

**EAE 001 (Land to the south of A917, East of Elie and Land to the North of Grange Road)**

**General Representations, or Specific Site Not Specified**

Andrew Aitken (142), P Brignal (245, 964), Gail Rollins (261), S Bingham (310), D W Ferguson (702), Andrew Massie (700), John and Kathleen Barrie (705), John Cousins (822), Fiona MacLennan (821), Rosemary Burns (788), Duncan McCreath (819), Richard Craig (1276), Morag Bell (1319), Christopher Roy (1352), John Haswell Young (1147), Doreen Orr (1238), Alexander Terras (1371), Alastair Dickson (1552), Donald Thomson (1572), E Gilchrist (1568), Iain Murdoch (1579), Rod Pow (1657), Martin Forbes (1665), David Murdoch (1703), Mr and Mrs James Carstairs (1924), Nicola Best (2109), Kirsten McKinnon (2139), A G Bannerman (2668), Eva Muller-Allan (2731), Keith Geddes (2695), Harry Murray (2722), Nicola Clemence (2728), Stewart Bannerman (2802), Alastair Brown (3071): Delete proposal EAE 001.
<table>
<thead>
<tr>
<th>Name</th>
<th>Comments</th>
</tr>
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<tbody>
<tr>
<td>Elie &amp; Earlsferry Community Council (842)</td>
<td>If there is development a higher proportion of homes should be affordable than currently planned for.</td>
</tr>
<tr>
<td>Christine Dingwall (162), Shaun Middleton (191), Gail Rollins (261), Freda Osbourne (2391), James L Finlay (2622), Jo Giddins (2753), John Willoughby (3019)</td>
<td>Preference to develop land to the East of Elie but not land to the North of Grange Road.</td>
</tr>
<tr>
<td>Sharon Kemp (1220), Ronnie Hanna (1290)</td>
<td>Limited development to allow affordable housing at land south of A917 may be acceptable.</td>
</tr>
<tr>
<td>George and Kathleen Tait (707)</td>
<td>Locate quality housing on the southern end of the site.</td>
</tr>
<tr>
<td>E Gilchrist (1568), Iain Murdoch (1579), Martin Forbes (1665), Nicola Best (2109)</td>
<td>Preference for a small (10 houses maximum) residential-only expansion, with a mixture of tenure, house size, layout and architecture.</td>
</tr>
<tr>
<td>Mr and Mrs James Carstairs (1924)</td>
<td>A small number (25) of well-designed and carefully sited affordable houses may be acceptable if it can be guaranteed that they remain affordable in perpetuity.</td>
</tr>
<tr>
<td>Mr &amp; Mrs Haxton (33)</td>
<td>Limited development at the east end of the village, including general parking, additional community facilities and some social affordable housing for local resident occupation might be possible.</td>
</tr>
<tr>
<td>Morag Bell (1319)</td>
<td>Limit development to twelve houses at Grange Road and some houses East of Elie from the surgery to the end of Wadeslea, similar to existing Council houses, and available to rent in perpetuity.</td>
</tr>
<tr>
<td>P Brignal (245), John Cousins (822)</td>
<td>Limit development East of Elie to no more than is included in the adopted Local Plan.</td>
</tr>
<tr>
<td>Ronald Oliver (1540)</td>
<td>Amend developer requirements to require a design competition for this proposal.</td>
</tr>
<tr>
<td>Lawrence Bell (1266), Morag Bell (1319)</td>
<td>Consider land East of Elie for cemetery use.</td>
</tr>
<tr>
<td>Land to the South of the A917, East of Elie</td>
<td></td>
</tr>
<tr>
<td>Derek Farmer (159), Agnes Lind (201), P Brignal (245), David Peebles (306), David Smith (685), John and Kathleen Barrie (705), David Anderson (771), Thomas Somerville (791), Jenny Nicol (795), Deirdre Smith (800), Jim Craig (900), Thomas Strathearn (924), Nigel Scott (926), E Craig (1272), Michael Dickson (1404), P Dickson (1441), L J Gilchrist (1444), Alastair Dickson (1552), Douglas Mc Nair (1761), Tom Gilchrist (1765), Julie McLean (1948), Robert Scott (2667), Niall Dickson (2792), A G Bannerman (3722)</td>
<td>Delete proposal for development of land to south of the A917, East of Elie.</td>
</tr>
</tbody>
</table>
| Mr & Mrs Haxton (33), P Brignal (245, 964, 1679), S Bingham (310), John and Kathleen Barrie (705), Thomas Somerville (791), Jenny Nicol (795), Deirdre Smith (800), Duncan McCreath (819), Richard Craig (1276), Alexander Terras (1371), P Dickson (1441), L J Gilchrist (1444), Ronald Oliver (1540), Alastair Dickson (1552), E Gilchrist (1568), Iain Murdoch (1579), Rod Pow (1657), Martin Forbes (1665), David Murdoch (1703), Julie McLean (1948), Nicola Best (2109), Robert Scott (2667), Alastair Brown (3071), A G
Bannerman (3722): Remove proposal for employment land as part of the proposal.
E Gilchrist (1568), Iain Murdoch (1579), Martin Forbes (1665), David Murdoch (1703), Nicola Best (2109): Class 4/business units should be located on the eastern fringe of the site, minimising traffic impact on Wadeslea.

George and Kathleen Tait (707): The Small Business Units should be located on the North Side of the A917 near the South Lodge of Elie Estates.

Mr & Mrs Haxton (33), S Bingham (310), Dr Jim Craig (900), Doreen Orr (1238), E Craig (1272), Alexander Terras (1371), E Gilchrist (1568), Iain Murdoch (1579), Rod Pow (1657), Martin Forbes (1665), David Murdoch (1703), Julie McLean (1948), Nicola Best (2109), Kirsten McKinnon (2139): Remove reference to retail uses.

Nigel Scott (926): Housing for sale should have a covenant in the deeds preventing use as holiday homes.

John and Kathleen Barrie (705): Quality housing should be located on the southern end of the site.

Land to north of Grange Road

Andrews Simpson (140), Campbell MacDougall (146), Chris Hanna (148), W J King (149), Robert and Christine Dingwall (162), John Drysdale (166), David Smart (189), Peter Forgie (190), Shaun Middleton (191), Richard Cowan (196), Robert Cumming (199), Susan Carnegie (200), Agnes Lind (201), David Wilson (211), Leonard Russell (214), Alan Robertson (222), Christopher & Barbara Mennie (223), David Simpson (224), Ann Johnson (225), P Brignal (245), Alexander A F Osbourne (247), Alexander Cowan (248), Sandra Carruthers (251), Gail Rollins (261), David and Alan Rodger (285), Rachel Fraser (286), Anne Riddle (287), Alistair Macnaughton (288), George Shand (289), Pam Dippie (290), David Peebles (306), S Bingham (310), Ann Wybar (337), Peter Kyle (392), W Neil Cuthbert (393), Bill Gow (394), Fiona Gow (395), Jenny Gilderdale (510), Alan Borthwick (567), Peter Rae (628), Robert A Lind (715), Douglas Macrae (722), Vincent Walker (729), C MacLennan (813), Fiona MacLennan (821), Rosemary Burns (788), M E M Waddell (870), Jim Craig (900), Graham Stevenson (939), Neil Burns (1215), Sharon Kemp (1220), E Craig (1272), John Fingland (1281), Ronnie Hanna (1290), Alan Lundie (1356), Michael Dickson (1403), Mae Noble (1406), P Dickson (1441), L J Gilchrist (1444), Simon Malthouse (1490, 1572), Gordon Stevenson (1539), Ronald Oliver (1540), Alastair Dickson (1552), Donald Thomson (1572), Robert Armour (1634), David Adams (1684), Douglas McNair (1761), Tom Gilchrist (1765), Olivia Howard (1797), Hilary Watt (2173), Sheila Souter (2291), Freda Osbourne (2391), Jean Glen (2402), J Scott Cochran (2407), James L Finlay (2622), David Syme (2624), Liz & Colin Carnie (2629), Diana Crichton (2630), John Stevenson (2644), Robert A Graham (2666), R M S Allison (2679), Brian Leggat (2683), William & Irene Cochran (2688), Leslie M Quinn (2689), Peter Nussey (2691), David Newton (2694), Bernard & Denise Burgin (2749), Jo Giddins (2753), Dorothy Parker (2762), James Laird (2763), Elaine Forgan (2768), Niall Dickson (2792), Sara Bishop (2797), George Morris (2940), Iain Dalglish (3017), John Willoughby (3019), Keith MacLennan (3818): Delete proposal for development on land to north of Grange Road.

Ronald Oliver (1540): There should be a detailed and robust design brief, and a design competition should be considered. Development should be undertaken in stages. A strong tree-belt along the countryside boundaries should be completed in advance of
Mr & Mrs Haxton (33): Development should be high quality, low rise detached units of mixed design, and low density. Plots should not be sold on an individual basis to allow a harmonious and timeous development by an established national housebuilder.

Summary of responses (including reasons) by planning authority:

Elie & Earlsferry Issues

John Mackay (2292), P Brignal (245, 1679), S Bingham (310): Comments received through consultation suggest sites on the northern side of Elie (behind Woodside Road) should be considered in preference to those identified in the Proposed Local Development Plan.

Land north of Elie behind Woodside Road had been identified as an opportunity in the ‘Elie & Earlsferry Landscape Capacity Study’ May 2012 (submitted as a supporting document in the representation from Alex Nairn, Elie Estate (2074)), prepared on behalf of Elie Estate in support of their candidate site submission. This area of land was not included as part of the candidate site put forward by Elie Estate and has therefore not been subject to site assessment or consultation. The land is enclosed by woodland, which may entail that access to the site, and integration with the settlement would be more difficult to achieve.

Land north of the A917, east of Elie, was included in the candidate site submission from Elie Estates (candidate site ref. LDP-EAE001a). The area was proposed by Elie Estate as a tourism/business opportunity within a woodland framework to be developed as part of a long-term strategy. Fife Council considered that the concept for this area of land was not sufficiently advanced, and that in view of the sensitivities of the site (e.g. built heritage), it was not appropriate to include a proposal in the Local Development Plan for this part of the candidate site. In Elie Estates ‘Submission to Fife Council LDP Main Issues Report’ March 2013 (submitted as a supporting document in the representation from Alex Nairn, Elie Estate (2074)), provision was made for business opportunities in a cluster adjoining the doctors’ Surgery on Wadeslea. Fife Council considers that as a potential housing site, land north of the A917, east of Elie, would offer less potential to integrate with the existing settlement than land to the south of the A917.

In view of the above considerations Fife Council considers that it would not be appropriate to allocate alternative sites adjacent to the village to replace those identified in the Proposed Local Development Plan.

EAE 001 (Land to the south of A917, East of Elie and Land to the North of Grange Road)

Mr & Mrs Haxton (33), Andrews Simpson (140), Andrew Aitken (142), Campbell MacDougall (146), Chris Hanna (148), W J King (149), Derek Farmer (159), Robert and Christine Dingwall (162), John Drysdale (166), David Smart (189), Peter Forgie (190), Shaun Middleton (191), Richard Cowan (196), Robert Cumming (199), Susan Carnegie (200), Agnes Lind (201), David Wilson (211), Leonard Russell (214), Alan Robertson (222), Christopher & Barbara Mennie (223), David Simpson (224), Ann Johnson (225), P Brignal (245), Alexander A F Osbourne (247), Alexander Cowan (248), Sandra
The East Neuk Community Action Plan (ENCAP) is an initiative which aims to put the community at the heart of shaping future development in the East Neuk settlements for the long term, over 50 years and more. The major landowners in the East Neuk (in the shape of the East Neuk Estates Group) have engaged with Fife Council, the local communities via the Community Councils, and local business representatives, to set up a steering group to guide the production of a series of community action plans for the settlements in the East Neuk (that together will form the overall East Neuk Community Action Plan). LEADER funding was secured to allow ENCAP to retain consultants to work up a community engagement toolkit to deliver each of the settlement action plans and, over the course of 2015/16, local communities will begin to work up their action plans for their settlements. The intention is that any land use proposals which emerge through the community action plans will be put forward for consideration through the Local Development Plan process. Whilst the Community Action Plans (and the overall ENCAP) will have no formal planning status, and Fife Council as planning authority will retain the governance over what goes in to the LDP, there is a clear desire to match
community wishes regarding future development of their settlements with what appears in the LDP. It is envisaged that local community action plans will inform future iterations of the Local Development Plan for Fife.

Land to the south of the A917, east of Elie was identified in the Fife Local Development Plan Development Strategy Consultation, December 2013 (Core Document CD13) as a Reasonable Alternative for inclusion in the Local Development Plan, with the site assessment (Core Document CD15) highlighting potential for long term development that integrates with Elie, providing that development is sensitively designed and landscaped, whilst also recognising that the proposed scale of development would be more than would be supported by the FIFEplan strategy. Land to the north of Grange Road had originally not been supported through the site assessment process on the basis that due to existing allocations, this site is not considered to be required at this time and it would be preferable for the proposals to be considered in the context of the emerging East Neuk Community Action Plan. It was also noted there was limited integration with the village, and landscape issues had to be addressed. Consequently, the site was not supported.

The main reason that the sites were subsequently identified in the Proposed Plan was due to the response from consultation since the original site assessment was carried out, and work to mitigate issues identified in the earlier assessment.

The Development Strategy consultation was published in December 2013 with consultation closing in February 2014. During this consultation period a community consultation event was held on 23 January 2014 in Elie attended by more than 100 people and members of the Community Council. A follow-up presentation to the Community Council was made on 3 February 2014 to report the results of the feedback from the exhibition.

Elie and Earlsferry Community Council subsequently submitted comments to the Development Strategy stating that development of these sites was supported by the community in principle, but without prejudice to the right of the community to make further observations once the details are formulated. No other comments were received regarding this site at that time, other than those from the site promoter.

Elie and Earlsferry Community Council (representation reference 842) has since highlighted in their comments on the Proposed Plan that thoughts are divided on the proposals for Elie and Earlsferry. The Community Council considers that there is a slight majority of permanent residents in favour of some development within the village. A large number of representations were received to proposal EAE001 through the Proposed Plan consultation. The majority of these representations were objections, with many of those specific to the separate sites forming this proposal. A larger number of objections relate specifically to land to the north of Grange Road. A number of representations supported a more limited scale of development, with most of these favouring the land East of Elie. Mr Alex Nairn, Elie Estate (2074) promoting the site states that development will provide a range of benefits for the local community, and that the areas identified for development represent the most suitable areas for the settlement following assessment.

It is acknowledged that the proposals have come forward in advance of a formal toolkit currently being drawn up for ENCAP. However, the site promoter has attempted to adhere to the principles of community involvement, and further community consultation
will be required through the ENCAP process (as set out in the developer requirements in the Proposed Plan) before the proposals can proceed.

The sites to the East of Elie and at Grange Road have been grouped into a single proposal to ensure the provision of community and employment uses which are proposed to be provided on the land to the East of Elie. The developer requirements for this proposal state that a development framework will be required to guide the design and layout of these sites and longer term growth. The development framework will be produced through further consultation with the community through the ENCAP process. This process will identify requirements for community facilities and employment provision. Requirements and delivery of planning obligations must be agreed across both sites in combination.

The Proposed Plan contains developer requirements to mitigate against potential negative impacts highlighted through the site assessment should these sites be taken forward. Further discussion of specific issues highlighted through the site assessment is set out in the sections below.

Whilst the proposals for Elie and Earlsferry represent a significant level of growth in relation to the settlement, they are intended to provide for the longer term future of the settlement (a 30 year timescale). It is considered that the locations identified in the Proposed Plan represent the best options for the future growth of Elie and Earlsferry. The sites identified are considered to provide logical and defensible boundaries that will be further established through proposed landscaping improvements. Land to the east of Elie extends as far east as the existing walls of Elie Estate grounds to the north of the A917, whilst land to the north of Grange Road is a discrete field bound by roads and existing housing.

It is Fife Council’s view that over the longer term development timescales the scale of growth can be accommodated without detriment to the settlement as a whole, whilst providing benefits for the local community.

It is considered that settlements such as Elie and Earlsferry should provide opportunities for those who wish to remain in the area to live and work.

The Approved TAYplan Strategic Development Plan (Core Document CD4) Policy 1 states that Local Development Plans may provide for some development in settlements not defined as principal settlements where this can be accommodated and supported by the settlement. The policy also highlights support for development that meets specific local needs or supports regeneration of the local economy in rural areas. It is considered that the proposals for Elie and Earlsferry can be justified in this context, taking into account the provision of community and employment uses (to be agreed following further consultation).

Whilst land to the north of Grange Road is physically separated from the settlement by the golf course, it is within walking distance of facilities within the settlement such as the library and public house. Furthermore, the Proposed Plan includes developer requirements to extend the 30mph zone and footpath/cycle connections which will increase integration of both new and existing development along Grange Road. The site to the north of Grange Road has been deliberately identified as a low density development in keeping with the existing residential pattern in the area. Any substantial increase in the number of houses proposed for the site through a planning application...
would be considered contrary to FIFEplan.

Where possible, when identifying locations for new housing and other uses, Fife Council considers the re-use of previously developed land before development on greenfield sites, in line with *Scottish Planning Policy (2014)*. In order to conform to TAYplan Strategic Development Plan requirements, however, it has been necessary to include greenfield development sites in the Local Development Plan. Further, the provision of a mix of brownfield and greenfield sites is required to provide sufficient choice for the market to deliver the developments an area needs.

**Landscape, townscape, views and character**

The indicative sketches, development requirements and the green network priorities provided in FIFEplan set out key principles to guide the design of development on this site. These principles take into account the impact of the development on existing townscape and natural heritage assets, the landscape setting and key views into, from and through the sites.

For land to the East of Elie the green network priorities for the site seeks to address the potential impact of the development on the coastal habitat by creating a transition between the woodland to the north of the site and the coastal grassland to the south. The site north of Grange Rd is situated on a low ridge. The site assessment recognises that this area of land is a highly visible element of landscape setting for Earlsferry, prominent across the golf course, from the north and in distant views from higher ground. The site assessment also acknowledges that development would be likely to change the character of existing development north of Grange Road, and would remove glimpses of landscape setting beyond.

The existing housing along Grange Road is set slightly lower, with only the larger buildings visible in some views from the north. It is therefore acknowledged that development on the higher adjacent ground will have an impact on the landscape. Development requirements set out in the Proposed Plan seek to mitigate the landscape impact of developing land to the north of Grange Road by limiting development to low density development in keeping with the existing residential pattern, and state that bespoke designs may be appropriate, reflecting existing built development. New housing on the northern boundary would be expected to face north with appropriate boundary treatments to provide an attractive settlement edge for Earlsferry.

The developer requirements and indicative sketches for these sites have been discussed with SNH recognising the landscape sensitivities of the sites. Both sites are identified as within a Local Landscape Area in the Adopted St Andrews & East Fife Local Plan (Core Document CD9).

More detailed consideration of the impact of the design of the development on the landscape (including the timing of landscape works), views, built and natural heritage will be undertaken through the preparation of a development framework (as set out in the developer requirements), and through the planning application process. Ronald Oliver’s comments (1540) regarding the suitability of holding design competitions for these sites are noted.
Transport

Fife Council Transportation Services have been consulted throughout the development planning process. Mitigation for potential negative impacts has been included in the developer requirements for these sites in the form of relocation of speed limit boundaries and improved footway/cycleway connections. Extension of the 30mph zone and enhanced footpath/cycle connections (referred to in the green network priorities) are considered to offer the potential to improve connectivity of both new and existing development at land north of Grange Road to Earlsferry.

Detailed matters, such as the specifications of road access would be dealt with at the planning application stage. The sketches shown in support of the proposal are indicative only, and more detailed consideration would be given to road connections/junctions and enhanced footpath/cycle connections in due course either through the development framework or planning application stage.

In relation to land East of Elie, proposals would provide additional parking for the doctors’ surgery alleviating existing issues. The site would also allow for the provision of alternative access routes to and from the east of the town to the popular visitor attraction of Ruby Bay.

Ferry Road is a lightly used road, and the modest number of houses proposed is unlikely to result in a significant increase in vehicle movements per hour. The verge to the east bordering the golf course is part of the adopted road, and is wide enough to accommodate a footway. It would not be considered necessary to widen the road carriageway as a result of proposed development.

Ferry Road forms an on road part of the existing cycle network from Elie and Earlsferry to Kilconquhar. The site north of Grange Road allows potential for a section of an off road cycle route along Ferry Road, with a long-term aspiration to improve cycling connections.

Two points of access are identified for land to the north of Grange Road through a proposed upgrade of the vehicular track on the northern boundary of the site, allowing adoption by Fife Council. It is considered that both sites are capable of meeting the Scottish Government Policy on Designing Streets.

It is acknowledged that the site is poorly served by public transport.

Environment

The land to the south of the A917 is not classified as prime agricultural land; however this classification is just one of many factors that have been considered as part of the decision to allocate this site for development. Land to the north of Grange Road is classified as prime agricultural land (Class 3.1). The representation from Mr Alex Nairn, Elie Estate (2074) states that the land at the Grange has a particularly high sand content and is incapable of being cropped or used for any purpose other than as grazing land.

The development requirements for the site include a number of green network priorities that will help to mitigate the impact of development on wildlife by maintaining appropriate habitat connectivity. The requirement for more detailed survey work on protected species will be determined as part of any planning application process.
Fife Council’s Light Green Fife sets out the Council’s approach to minimising light pollution from street lighting (see supporting document SD1 Light Fife Green page 17 section 9.2) which is based on The Scottish Executive Guidance Note “Controlling Light Pollution and Reducing Lighting Energy Consumption”.

Fife Council does not agree that the development of the land to the south of the A917 would restrict the potential future relocation of the Fife Coastal Path should this be required as a result of erosion, the indicative sketch for the site and green network priorities indicate that good connections should be provided through the site so that routes can be provided to the coast. This will ensure that there are alternative routes for the Coastal path should the need arise.

The Fife Shoreline Management plan does not indicate that there is a particular risk of erosion or land-slides on the site to the south of the A917 (see Core Document CD34 Fife Shoreline Management Plan 2011 pages 136-137).

Economy and Employment Land

It is Fife Council’s view that settlements such as Elie and Earlsferry should provide opportunities for those who wish to remain in the area without having to travel significant distances to find employment. The potential inclusion of small business units (on land East of Elie) in the proposal is considered to offer opportunities to assist this aim, including potential premises for small start-up ventures. It is highlighted, however, that community and employment uses to be provided on site will be identified through further consultation with the community, and are not set in stone.

The Proposed Plan limits employment development on land East of Elie to Use Class 4 (business land compatible with housing), and further stipulates that design and layout should ensure there are no amenity impacts on adjacent residential areas. In view of these limitations, the location is considered to be appropriate. Planning consents for any development will include specific conditions to address any potential amenity issues that could occur, either during the construction process or thereafter. Local Development Plan policies on amenity (Policy 10) will help to protect existing amenity.

It is considered that development can be accommodated without detriment to the settlement as a tourist destination.

An increase in the resident population is also likely to provide some support for local shops and services, particularly outside the tourist season.

It is considered that small-scale employment uses would be unlikely to negatively impact on Elie High Street.

Potential transportation issues are addressed above.

Retail

Many comments consider that retail provision (on land East of Elie) is not necessary and could be detrimental to shops in the centre of Elie. Elie is identified as a Local Centre in the Proposed Local Development Plan and would also receive protection through Policy 6 ‘Town Centres First’. The Proposed Plan also mentions that any retail use should be complementary to the existing centre.
As highlighted above, community uses to be provided on site (including potential retail uses) will be considered in more detail through further consultation with the community.

**Infrastructure and services**

The support for proposals for additional community space and facilities is welcomed. Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision. Detailed matters will be dealt with at planning application stage.

The site takes a phased approach to development in order to avoid capacity issues at Elie Primary School.

An increase in the resident population is likely to provide some support for local shops and services, particularly outside the tourist season.

**Amenity**

Planning consents for any development will include specific conditions to address any potential amenity issues that could occur during the construction process. Local Development Plan policies on amenity (Policy 10) will help to protect existing amenity. Potential depreciation in property values and loss of views are not a material planning consideration.

The development of proposal the land south of the A917 would extend and enhance the existing public open space.

**Housing/Affordable housing issues**

Significant concerns were raised through the consultation regarding the lack of affordable housing, the proportion of homes within Elie and Earlsferry that have become second homes or holiday homes. Fife Council cannot legally require the use of a house as a primary residence. In line with Local Development Plan Policy 2 Homes, Figure 2.2, at least 30% of any housing development in this area will be affordable housing, and the Council’s Supplementary Guidance on Affordable Housing provides detailed guidance on how affordable housing will be achieved and contains details of the mechanisms through which Affordable Housing will be kept affordable to meet the future needs of local people.

Some representations have requested an increase in the proportion of affordable housing on this site. Whilst, provision above the 30% requirement is likely to be viewed favourably, it is considered that it would be difficult to require a higher level of provision. Scottish Planning Policy (Core Document CD1) states that the level of affordable housing required as a contribution within a market site should generally be no more than 25% of the total number of houses.

The developer requirements for this proposal state that ‘Requirements and delivery of planning obligations must be agreed across both sites in combination’. This would allow
affordable housing requirements for the site north of Grange Road to be delivered as part of the site East of Elie. This is considered to be appropriate given the requirement for low density, potentially bespoke housing delivery on land to the north of Grange Road.

The aim of the proposal is to provide for a mix of uses that will create employment opportunities for those looking to stay in the local area.

Fife Council has a statutory duty to ensure that the FIFEplan Local Development Plan (LDP) conforms to the TAYplan Strategic Development Plan before it can be adopted. The Council must maintain at least a 5 year effective housing land supply in the St Andrews and North East Fife Housing Market Area, and the Local Development Plan should identify sufficient sites to meet the housing land requirement for 10 years as detailed in the TAYplan Strategic Development Plan. Allocating a generous supply of land for housing across the Housing Market Areas in the Local Development Plan gives the flexibility necessary for the continued delivery of new housing should unpredictable changes to the effective housing land supply occur during the lifetime of the Local Development Plan. Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with in Issue 2B Homes.

Miscellaneous

Comments relating to the Local Development Plan consultation process are addressed in the Statement of Conformity (Core Document CD45). Comments relating to consultation carried out, separate to the Local Development Plan process are noted.

Fife Council Bereavement Services have been consulted throughout the development planning process. No need has been identified for a new cemetery in Elie.

The sites to the East of Elie and at Grange Road have been grouped into a single proposal to ensure the provision of community and employment uses which are proposed to be provided on the land to the East of Elie. However, in preparing the Proposed Plan both sites have also been considered independently. It is considered that the developer requirements included in the Proposed Plan can mitigate against potential negative impacts highlighted through the site assessment. Comments regarding the viability of land East of Elie are noted.

It is acknowledged that the proposals have come forward in advance of a formal toolkit currently being drawn up for ENCAP. However, the site promoter has attempted to adhere to the principles of community involvement, and further community consultation will be required through the ENCAP process (as set out in the developer requirements in the Proposed Plan) before the proposals can proceed.

Support from SEPA relating to requirements for high quality SUDS provision are noted. The site assessment for land north of Grange Road identified no evidence of mining on site but noted that the Coal Authority will need to be consulted as part of any planning application.
Reporter's conclusions:

Elie and Earlsferry Issues

1. Housing markets areas, not individual settlements, are the geographical areas used to determine housing requirements. Scottish Planning Policy explains that one of the roles of the planning system is to identify a generous supply of land for each housing market area to support the achievement of the housing land requirement. The overall adequacy of the supply across the plan area is considered in detail at Issue 2(b) Homes.

2. Elie and Earlsferry are within the St Andrews and North East Fife Housing Market Area. TAYplan sets out the average annual housing market build rate required across the housing market area to ensure an appropriate supply of housing land is provided. Within the East Neuk area, Elie and Earlsferry are of a size which can reasonably accommodate a degree of growth. While Elie and Earlsferry are not identified as a principal settlement, TAYPLAN indicates that some development may be accommodated in settlements that are not defined as principal settlements. It is appropriate to allocate a range of sites across a housing market area. Given this context, I am satisfied that the council acted reasonably in identifying these housing sites, including community and employment uses, in Elie and Earlsferry. This is particularly so in light of the fact that the council expects these development opportunities to extend beyond the period of the proposed plan, and to take place over 30 years. I believe that this lengthy timescale would allow the village to reasonably adjust and support the proposed expansion. I am also satisfied that the process set out in the proposed plan for bringing these sites forward for development, including the preparation of a development framework, is appropriate, as it is based on a design led approach.

3. It is contended in some representations that other more suitable sites around Elie and Earlsferry should be developed in preference to those allocated. However, there are no other sites in this settlement grouping before this examination. Another site is shown to the east of Elie and north of the A917 in the document “Elie and Earlsferry Site LDP EAE001a, LDP EAE001b, LDP EAE002: February 2014”, but it is also not before the examination. In any event, while I believe that the site shown is well related to the development site proposed on the eastern side of Elie, it is not so well related to Elie itself. I therefore have doubts about its appropriateness as an allocation. I also have doubts about the likelihood of finding appropriate development opportunities around the northern edge of the settlement grouping from the eastern end of Woodside Road up to Ferry Road, because this area is constrained by the presence of golf courses, and the wooded, more intimate character of the policies at Elie. In the circumstances, I consider the potential options for expanding this settlement grouping at the present time appear limited.

4. I consider the allocation (EAE 001) proposed at Elie and Earlsferry in more detail below.

EAE 001 (Land to the south of A917, East of Elie, and land to the north of Grange Road)

5. EAE 001 comprises 2 sites, one at the eastern edge of Elie on the southern side of the A917, and the other to the north of Grange Road at Earlsferry. The former extends to 5.8 hectares, and the latter to 5.9 hectares, and they comprise fields. The allocation
to the east of Elie forms part of a larger area proposed for development in the longer
term. The proposed plan estimates the housing capacity of the allocated sites as 80
houses, with 55 being to the east of Elie and 25 to the north of Grange Road. This is a
significant increase on the allocation put forward in the adopted local plan for 20 houses
on a part of the site to the east of Elie (EAE 01). The indicative total housing capacity of
the allocations and the area for longer term development, as shown in the proposed
plan, is 190 houses. With the exception of the area allocated for housing, the balance of
the sites are designated as countryside and local landscape area in the adopted local
plan.

6. The adopted local plan indicates that the population of Elie and Earlsferry was 947
people. While I acknowledge that an allocation of the scale proposed would therefore
represent a significant expansion of the settlement grouping, in my view, it would remain
small. I note the proposed allocation is a part of the housing land supply, and
contributes towards meeting the housing land requirement for the housing market area
and TAYplan. Concern was expressed about the new housing being purchased as
second homes or for holiday letting, but as the council points out it cannot exercise
control over this. Affordable housing would have to be provided as a part of the
proposed allocation. The minimum level of provision would be in line with Policy 2 of the
proposed plan and the council’s Affordable Housing Supplementary Guidance. As no
exceptional circumstances have been demonstrated, it would be unreasonable to
impose a higher level of affordable housing. The submissions supporting the allocations
emphasise the importance of affordable housing, and it would be open to those
promoting the allocation to propose a higher level than that set out in the policy. In order
to achieve suitable proposals for the allocations, I believe that the development
requirements in the proposed plan should highlight a need to provide a mix of tenures
offering a range of housing and lifestyles.

7. In preparing the proposed plan, I note that the council has consulted service
providers, including the education and road authorities, and that none have objected in
principle to the proposed expansion because of increased stress on community services
and infrastructure. Given this, and while stress points could potentially emerge, I
consider that the effects of the proposed development could probably be mitigated.
While the proposed plan refers to avoiding capacity issues at Elie Primary School, this
can reasonably be achieved by controlling the pace of development. I do not consider
the projected annual average build rate of houses to be excessive. If planning
applications are submitted proposing higher build rates and/or additional housing, they
would need to show that all the impacts could be satisfactorily addressed. Where
shortfalls in services are identified, developer contributions could be required to ensure
adequate provision in line with Policy 4: Planning Obligations. In the circumstances, I do
not consider that the expansion proposals for the settlement grouping could be justifiably
rejected on the grounds of their adverse impact on local community services and
infrastructure. There is also no evidence which demonstrates that the expansion
proposals would undermine the vitality and viability of the village centre. Indeed, I
consider that the proposals taken as a whole could potentially contribute towards
supporting it. The effects of development on the existing centre, community services
and infrastructure would be assessed further once detailed proposals have been
prepared. Drawing these matters together, I do not consider that the expansion of the
settlement grouping could be regarded as likely to have an unacceptable impact upon
the local community.

8. The sites form part of a sensitive, larger, open, coastal landscape, lacking significant
features. The one to the east of Elie is flat, and the other at Grange Road has a low ridge through it running from west to east with gentle slopes. Both sites are prominent, and their development would have a significant visual impact from various viewpoints, including the approaches to Elie and Earlsferry. However, development at both would be seen within the context of existing development, and I am satisfied that it would be unlikely to have significant and unacceptable adverse effects on views of the surrounding countryside or the built up areas.

9. I consider that the site to the east of Elie would extend the linear pattern of development found in the settlement grouping. The existing settlement boundary here is weak, the allocation would help consolidate the edge, and the longer term boundary would be strengthened by the amenity buffer planting proposed at the eastern edge. The proposed plan should indicate that this planting will be carried out at an early stage, and that it will be protected during the construction phase of this allocation. The site is also reasonably set back from the coastal edge and, as such, I do not believe that its development would unacceptably affect the Fife Coastal Path, Ruby Bay, the Lady’s Tower, or Elie Lighthouse. I am satisfied that if the coastal path was subject to erosion or land slides that the allocation would be unlikely to prevent an acceptable alternative route being established. I consider the allocation and the longer term expansion area to be a natural eastwards extension of the settlement grouping, rather than ribbon development. I also note that the proposed plan reasonably requires the open space to the south to be extended and enhanced.

10. The site at Grange Road adjoins the rear of the ribbon of houses, which has been developed in a piecemeal way along the road. They are separated from the settlement grouping by the golf course. While the council initially rejected this part of the allocation, I am satisfied that a small scale, very low density housing development, as envisaged, would relate well to this housing, and to the settlement grouping to the south. It would also mean that views should not be unacceptably affected. The site is well contained by the existing housing to the south and west, Ferry Road to the east, and a well defined track to the north. I am not persuaded that development here, when combined with the existing housing, would create an isolated, small hamlet because the settlement grouping is nearby, or that it would set a precedent for inappropriate housing development in the countryside. While the site is class 3.1 prime agricultural land, I do not consider that this undermines the allocation because the site would form a component of the settlement strategy in the proposed plan. In order to maintain the character of this area, I believe it important that the scale of development is restricted to 25 houses, and that the development requirements indicate that proposals in excess of this would be treated as being contrary to the terms of the proposed plan.

11. I acknowledge that the sites are greenfield but, in the absence of sufficient and appropriate brownfield sites, and of sites within settlements, I consider that sites which are adjacent and well related to settlements and existing housing outwith it, such as these, are acceptable. I am satisfied that the allocation would not inappropriately change the relationship between the coast, the settlement grouping, and the contrasting landscape. I therefore do not consider that an allocation for housing would materially detract from the setting of the settlement grouping or undermine the local landscape area designation. In the circumstances, I do not believe that the removal of the allocation from the proposed plan could be justified on landscape and visual impact grounds. I note that the allocation is not covered by any nature conservation designation. While I have no doubt that there will be nature conservation issues to address, particularly as the site to the east of Elie lies close to designated areas, there is
nothing in the evidence which indicates that they would undermine the allocation, and I accept that they could be dealt at the more detailed planning application stage.

12. A large part of the settlement grouping is a designated conservation area. It therefore has statutory protection in respect of its character and appearance. The conservation area abuts a small part of the western boundary of the allocation to the east of Elie, and the site at Grange Road is separated from the conservation area by the existing housing at Grange Road and the golf course. I can see no reason why proposals could not be devised for both sites which preserve the conservation area’s character and appearance. I also consider it unlikely that the effects of development on the residential amenity of nearby properties are likely to be such that the allocation would be undermined. I believe that such effects can reasonably be addressed once detailed proposals come forward.

13. The proposed plan indicates that the allocation is to provide all the community and employment uses on the site to the east of Elie. These may include small business units (class 4), additional parking for the doctor’s surgery and the business units, community space and facilities, and local retail. I consider that the provision of small business units would be appropriate because it would make the residential development more sustainable by offering employment opportunities locally. It would also add to the choice of sites and units available in the East Neuk. I see no reason why a sensitively designed development should damage the attraction of the settlement grouping as a tourist destination. I believe that the preparation of a development framework to guide the design and layout of the sites, as required by the proposed plan, should help achieve an appropriate standard of development for the 2 locations. Because of the range of local stakeholders involved, I am satisfied that it is reasonable for this allocation to have come forward through the East Neuk Community Action Plan process, even though a formal community engagement toolkit was not available, and for the allocation to continue coming forward through this process. The 2 sites are being promoted together, and I note that a viability assessment has been prepared which attempts to show that the site to the east of Elie would be viable on its own. However, I consider that, by its very nature, the study is speculative, and it does not cover all the requirements that may arise as a result of development taking place over both sites. I therefore give it little weight. Furthermore, I am satisfied that the site at Grange Road is suitable for a low density housing development on its own merits.

14. I am satisfied that the road network and nearby junctions should be able to accommodate the level of traffic that would be generated by the development at the 2 locations over the plan period and beyond. It also seems likely to me that adequate arrangements could be made to provide access to both sites as shown on the indicative sketches. The proposed plan sets out development requirements for extending the 30 mile per hour speed limit, the provision of cycleways, and the access arrangements for the Grange Road site. Given the layout of the existing roads in relation to the site to the east of Elie, I consider that it has the potential to provide good connections for walkers and cyclists to the settlement grouping and the village centre. While I accept that this is more difficult for the site at Grange Road because of its separation from the settlement grouping, I consider that an adequate connection could probably be provided to local facilities for a development of modest size, bearing in mind the improvements required in the proposed plan and the fact that Ferry Road is not (and is unlikely to be) a busy road.

15. Accessibility, access and parking issues, and the implications of the allocation for the existing road network, will require further consideration when detailed proposals are
In the meantime, I am satisfied that the proposed plan sets out a reasonable set of transport requirements for the allocation, and that the concerns expressed, including the assertion that there would be insufficient space at Ferry Road to provide proper walking and cycling connections, do not warrant the removal of the allocation.

16. As a consequence of the representations made, I believe that in relation to the site to the east of Elie the green network priority development requirements should be changed. The reference to National Cycle Route 76 should be replaced with a reference to a cyclepath because route 76 does not at present pass the site, and reference should be made to the council’s view that the site is to provide alternative access routes to and from the east of the town to the popular visitor attraction of Ruby Bay because this could influence the design and layout of the development.

17. Concerns were expressed about mining having possibly taken place on the site at Grange Road, but the council indicates that there is no evidence of this, and the preliminary technical information supporting the allocation does not identify any, instead, it indicates that the site is within a Coal Authority Consultation Zone, and that further consultation will be undertaken with the Coal Authority at the appropriate time. I believe this to be a reasonable approach, and am satisfied that this matter will be a material consideration at the planning application stage.

18. Overall, and taking into account all the matters raised, including the discussions with Scottish Natural Heritage, the extent of public transport provision, the possibility of light pollution, and the high sand content of the ground at Grange Road, I consider that the allocation would acceptably extend Elie and Earlsferry, and that it should be supported, subject to adjustments to the proposed plan, as set out below.

**Reporter's recommendations:**

I recommend that the following modifications be made:

1. In reference EAE 001 (Land to the south of A917, East of Elie and Land to north of Grange Road), page 83, add a new sentence at the end of the second paragraph of the additional development requirements to read:

   “...A mix of tenures is to be provided, which will offer a range of housing and lifestyles…”

2. In reference EAE 001 (Land to the south of A917, East of Elie and Land to north of Grange Road), page 83, adjust the first bullet point at the end of the additional development requirements relating to the Green Network Priorities for Land to the south of A917, East of Elie to read:

   “...Provide high quality development edges and boundary treatments fronting on to the A917 and along the eastern edge of the site (considering panoramic views within and through the site). Provide the planting at the eastern edge prior to any works commencing on site, and put in place appropriate measures to protect it during construction...”
3. In reference EAE 001 (Land to the south of A917, East of Elie and Land to north of Grange Road), page 83, adjust the second bullet point of the additional development requirements relating to the Green Network Priorities for Land to the south of A917, East of Elie to read:

“… - Provide a 3 metre wide cyclepath along the northern edge of the site…”

4. In reference EAE 001 (Land to the south of A917, East of Elie and Land to north of Grange Road), page 83, adjust the fourth bullet point of the additional development requirements relating to the Green Network Priorities for Land to the south of A917, East of Elie to read:

“… - Deliver a north-south access route along the western boundary of the site which provides access down to the coast from Wadeslea Road, and provide alternative access routes to and from the east of the town to the popular visitor attraction of Ruby Bay…”

5. In reference EAE 001 (Land to the south of A917, East of Elie and Land to north of Grange Road), page 84, add a new sentence at the end of the first paragraph of the additional development requirements relating to Land to the north of Grange Road to read:

“…The scale of development is to be restricted to the estimated housing capacity (25 houses). Proposals in excess of this will be treated as contrary to FIFEplan.”
### Issue 16

**St Andrews Area**

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<td>Reporter:</td>
<td>Dilwyn Thomas</td>
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**Body or person(s) submitting a representation raising the issue (including reference number):**

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<td>Clive Sneddon (3749)</td>
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<tr>
<td>Giles Irvine (231)</td>
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<td>Tim Butler (648)</td>
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<td>Michael Joy (792)</td>
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<td>Jean Stewart (1214)</td>
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**Provision of the development plan to which the issue relates:**

Settlement Plans: St Andrews, Strathkinness, Countryside Area
### Planning authority’s summary of the representation(s):

**ST ANDREWS**

**St Andrews Issues**

P M Uprichard (2784): Thousands of people will be added to the St Andrews population, despite heartfelt objections from residents who see their quality of life being downgraded.

St Andrews Environmental Protection Association Ltd (2119), J Watchman (2524): Significant allocations for housing are proposed, but there is no assessment of actual need for housing in St Andrews. Little affordable housing has been delivered. The impacts of cumulative housing constructed in recent times, have not been taken into account. Further major development is proposed for the Tay Coast, Leuchars and Guardbridge Area which will impact hugely on St Andrews.

St Andrews Environmental Protection Association Ltd (2119): The significant increase in housing has not been matched by any commensurate increase in the prospective roll of Madras College and an assessment of how a new school at Pipeland would serve this wide catchment area utilising sustainable development principles.

J Watchman (2524): The significant increase in housing has not been matched by an increase in employment opportunities, causing significant commuting to Dundee and Edinburgh. This is one of the reasons for the inadequate car parking capacity at Leuchars Railway station.

J Watchman (2524): Little thought appears to have been given to housing for older people (a rapidly expanding number in St Andrews) or satisfying what is the greatest need – namely affordable housing for local people in St Andrews (as opposed to the St Andrews Housing Market Area).

J Watchman (2524), P M Uprichard (2784): Question the demand for proposed hotel development in light of a significant amount of existing holiday accommodation, low occupancy rates, and the windfall Premier Inn development at the former abattoir site in Largo Road. Both also question the need for further student accommodation, highlighting accommodation already under construction.

J Watchman (2524): The expansion of the University at St Andrews West may lead to a significant amount of University accommodation in the St Andrews Conservation Area becoming surplus to requirements and available for redevelopment.

J Watchman (2524): There is a shortfall of public open space in St Andrews. This is increasingly under threat due to recent planning approvals.

St Andrews Environmental Protection Association Ltd (2119 & 2340), J Watchman (2524): Concerns about significant breaches of the St Andrews Green Belt and the creation of an indefensible Green Belt boundary at the eastern boundary of the proposed new school at Pipeland Farm. Concern that development will not be supported by necessary infrastructure e.g. capacity at the hospital and local GPs, and at the proposed school. It is understood that Fife Council plans to sell off its local office. The Community
Hospital will be landlocked by the proposed school at Pipeland. Station Park will not be required to deliver sports facilities for the secondary school if these activities are to be carried out at Pipeland Farm. If it is intended to retain Station Park as playing fields how will Fife Council manage and maintain this open space? Station Park may be surplus to requirements. Is its designation as Protected Open Space appropriate?

Old Course Hotel (3914): The Old Course Hotel request a modification to the green belt boundary defined within the Proposed Plan’s St Andrews Settlement Plan (see map attached to comment showing proposed amendment). The proposed modification would present a clearer definition of the landscape form and function to be managed by the green belt policy, based upon a defined (as opposed to an arbitrary) line on a map, by following roadways, farm tracks and tree belts, rather than drains or field edges. The modification would also give future certainty for the Old Course Hotel in relation to any future asset management plans it wished to bring forward in the medium term, relating to farm management and land use ancillary to the existing business.

P M Uprichard (2784): The Council should not rely on members of the public to tell them of issues with listed buildings. It is difficult for Fife Council officials to monitor conditions on development sites, and rely on members of the public to tell them if there are problems. This is unsatisfactory and inappropriate, especially when planning reports continue to recommend 30 or 40 conditions.

Suzanne Fernie (1336): The process for submitting comments is overly-complex.

STA 001: St Andrews West

Headon Developments (1879): The continued identification of STA 001 is noted and welcomed. In doing so, for St Andrews the proposed FIFEplan accords with TAYplan. Headon Developments are broadly supportive of the requirements and comments set out within the proposed settlement statement and the requirement for “all housing and commercial development within the Strategic Development Area requires to contribute on an equitable basis to the essential community infrastructure, including transportation and employment land.” Strategic development areas should be planned in a comprehensive and holistic manner. An overall development framework/masterplan is required to ensure that no part of an Strategic Development Area can prejudice another part, therefore undermining delivery. Without an agreed Development Framework/Masterplan, development at Craigtoun, of the scale (300-350 houses) and uses anticipated could undermine the delivery of the SDA. Leakage of units may undermine the development mass of the two hubs identified to the north of the Strathkinness Low Road. It is critical that FIFEplan applies a pro rata house build rate and a share of other uses across the Strategic Development Area. Development at Craigtoun should be limited to 150 units.

Beebe Land Ltd (1154): Object to introduction of a 2 hectare allocation of employment land within the allocated Craigtoun (North) and its limitation to Use Classes 4 (Business), 5 (Industry) and 6 (Storage or Distribution) on the basis that: 2Ha is not an equitable proportion of the 8Ha employment requirement for STA 001; the adopted Local Plan includes no employment allocation at Craigtoun following a Reporters concerns about impacts on local residents; Craigtoun (North) can provide a commercial land use strategy that allows for a range of employment uses, and it is noted from the Proposed Plan’s Development Requirements that in land use terms ; a Master Plan being progressed that aims to minimise adverse impacts on residents includes a diversity of
Michael Vernon (653): Questions why employment land has been moved into the Craigtoun area of STA 001, highlighting concerns raised through the examination of the adopted Local Plan about impact on residential properties. If employment land is to be allocated to the Craigtoun (north) area it should be located to the north, adjacent to the new proposed road link.

Beebe Land Ltd (1346): Object to the non-allocation of 13ha of land to the West of the Craigtoun (North) Allocation (see supporting attachment) and associated adjustment to the inner Green Belt boundary for the following reasons:

- There is an immediate shortfall in housing land supply at the start of the Plan period, and the ability of plan to maintaining at least a five year land supply is questioned.
- The extension area is visually self-contained and significantly screened by the existing landscape and topography.
- There are very limited views from the existing urban area to the extension site.
- Reporters have recognised that the 50-60m contour at Craigtoun could be an appropriate inner Green Belt boundary (with structural planting), in line with the Alison Grant Report to Fife Council in 2009.
- The 13 ha extension area has been considered as part of the master planning and technical studies undertaken for the preparation of a Planning Application in Principle.
- The extension could provide for: up to an additional 150 dwellings; a site for a Primary School; an extension of greenspace and structural landscaping; and extension to a range of movement routes including connecting to Lovers Lane footpath.
- The extension provides a 'natural' addition to the allocated site that will help ensure the longevity of Green Belt boundaries to the west of the Town.

Beebe Land Ltd (3906): Object to the site appraisal of candidate site LDP-STA001. The appraisal of the candidate site should be based on revised proposals for a 13ha extension to the existing allocation submitted through consultation in early 2014, rather than the original submission for a site of 56ha. A revised SEA site appraisal has been submitted in support. Continuation of the green belt is not justification for denying the extension in the context of a known housing shortfall. There is no evidence that the proposed extension would impact on the landscape setting. The proposed site has not previously been considered through examination.

Dr Fiona Vincent (1563): Object to the proposal. St Andrews does not need 1,000 extra houses. Proposed expansion is out of proportion to the town. It is probable that most inhabitants will work outside St Andrews leading to increased traffic issues. The area is important for a range of wildlife which would be driven away by development. The land provides valuable farmland, absorbs CO2 and controls rainwater. There will be an increase in air, noise and light pollution.

Rita Cornfield (2115, 2263): Object to the proposal. Development will alter nature of the town and impose excessive demands on its infrastructure. Particular objection to land between Craigtoun Road and Melville Road on the basis of: loss of productive agricultural land; density of development is too high; drainage, surface run-off and
flooding issues throughout the year which could get worse as a result of development; concern over lack of provision for landscaping. Any development between Craigtoun Road and Melville Road should be lower density, with high standards for drainage that should be controlled and monitored.

Michael Vernon (653): Questions the need for the proposed level of retail uses in the Craigtoun area, indicating that Andrews Town Centre should be the focus for new retail, pub/restaurant uses.

J Watchman (2525): The proposed Transport Link from the A91 connects with Younger Gardens, Melville Road, Bogward Road, John Knox Road and (presumably) Lamond Drive to the A917 those roads (in particular Bogward Road, John Knox Road and Lamond Drive (built at the latest in the 1970s) are not capable of providing an arterial route, including bus traffic for the proposed community use secondary school at Pipeland Farm. It is unlikely that traffic will divert from the A91 given the alternative of continuing along North Street to the A917.

P M Uprichard (2787): There is no mention of the previous ‘community engagement’ which was to be a feature of masterplanning. It would be helpful to find out what is the planned expansion of the University over the next 20 years. Student numbers have more than doubled since 1996 and there appears to be no limit to further increases.

Scottish Enterprise (1047): Scottish Enterprise supports the creation of new commercial business space within the Strategic Development, including creation of 10 ha of space for Research & Development or Science Park related enterprise.

SEPA (3636) supports the inclusion within the Development Requirements for:

- a Flood Risk Assessment (FRA) to be undertaken;
- a buffer strip along the watercourse, as this measure will help protect and improve the water environment;
- the requirement to consider through a feasibility study, the potential for restoration and improvement of the water environment through the site design;
- high quality SUDS; and
- a demonstration that any development will not adversely affect the integrity of the Firth of Tay and Eden Estuary SPA/SAC, either alone or in combination with other plans or projects.

NHS Fife (3857): Potential additional 1,090 houses in this area could have an impact on local healthcare services. It would be of benefit for discussions with NHS Fife to be arranged to confirm status of local GP and other healthcare services.

STA 002: Grange Road

University of St Andrews (2204): The University of St Andrews supports the allocation STA 002, for Grange Road, St Andrews, subject to the inclusion of additional wording to provide the required flexibility to avoid restricting delivery options available to the University. The University wish to preserve the opportunity to pursue development by way of partnership opportunities, which may include other forms of affordable housing or mainstream housing development. This could potentially include areas of the site being used for non-university uses, if this can be demonstrated as providing financial support.
to cross fund and facilitate development of the remainder of the site for University purposes. The Grange Road site is considered to be an attractive site due to the location and accessibility of the site, and suitability to deliver a variety of housing types whilst fitting in well with the surrounding land use and environmental context.

Dr Clive Sneddon (2266): Object to proposals at Grange Road STA 002 and Pipelands Farm STA 013 on the grounds that: the sites extends the southern boundary of St Andrews into rural and green belt areas, without showing compliance with existing policies; it sets a precedent to develop the southern hillside contrary to the strategy to develop to the west of the town; the southern hillside has existing drainage problems which cannot be resolved site by site.

J Watchman (2526): Why is there a further need for University housing at Grange Road, in addition to proposals at St Andrews West Strategic Development Area? Why is staff housing exempt from infrastructure contributions? Will the proposed staff housing also be subject of a legal agreement to make financial contributions if the staff housing becomes mainstream housing? Will there be a restriction preventing vehicular access to the west and in turn opening up the southern hillside green belt land for further development?

Dr Neill Travers (3509): This site is next to a largely retirement neighbourhood where people wish to live in peace and quiet. It is unsuitable for a student and staff “village” of 50 houses. There is a gas main under the area to be built on and there are problems with flooding. This development does nothing to help the shortage of Affordable Housing. This proposal could be located on land at the North Haugh where the impact will be less on the neighbouring properties and roads. Such a site would also be a lot more convenient for many students.

SEPA (3638) supports the inclusion within the Development Requirements for:

- a Flood Risk Assessment (FRA) to be undertaken;
- a buffer strip along the watercourse, as this measure will help protect and improve the water environment;
- the requirement to consider through a feasibility study, the potential for restoration and to investigate the possibility of opening up an existing culvert;
- high quality SUDS; and
- a demonstration that no diffuse urban run-off will enter bathing waters.

STA 003: New Park School

J Watchman (2527): Fife Council accepted a payment in lieu of on-site Class 4 development and, in turn, there is no longer a Class 4 requirement.

P M Uprichard (2798): This site has a derelict appearance, although referred to as ‘under construction’. The meaning of ‘Green Network Priorities - Develop a new high quality landscape edge with the green network’ is questioned.

STA 004: Madras College, Kilrymont

J Watchman (2528), Confederation of St Andrews Residents Associations CSARA (3688), St Andrews Environmental Protection Association Ltd (3746), Dr Clive Sneddon
It is premature to identify site as development opportunity due to the legal challenge relating to the proposed new school at Pipeland Farm. The grant of planning permission in principle does not empower the construction of the proposed community use secondary school at Pipeland Farm. Fife Council has not declared the site surplus to requirements, and it is not part of a Fife Council programme of land disposal.

J Watchman (2528), St Andrews Environmental Protection Association Ltd (3746): The specified alternative uses which offer scope to re-use the existing listed buildings should be preferred uses. If use for housing is based on the demolition of existing listed buildings, then it should be stated. Housing use should only be considered if it is established that none of the uses which offer scope to re-use the existing listed buildings are ruled out.

J Watchman (2528), St Andrews Environmental Protection Association Ltd (3746): Class 10 uses would be acceptable. A combined St Andrews Primary School Campus for Canongate PS, Greyfriars PS and Lawhead PS could be considered, or re-use as a college campus – as a replacement for Elmwood College or otherwise.

Confederation of St Andrews Residents Associations CSARA (3688): The site houses a listed building which cannot be demolished without formal process.

SEPA (3639) supports the inclusion within the Development Requirements for:

- a Flood Risk Assessment (FRA) to be undertaken; and
- a buffer strip along the watercourse, as this measure will help protect and improve the water environment.

STA 005: Madras College, South Street

J Watchman (2529), Confederation of St Andrews Residents Associations (3687), Dr Clive Sneddon (3749), St Andrews Environmental Protection Association Ltd (3747): It is premature to identify site as development opportunity due to the legal challenge relating to the proposed new school at Pipeland Farm. The grant of planning permission in principle does not empower the construction of the proposed community use secondary school at Pipeland Farm. Fife Council has not declared the site surplus to requirements, and it is not part of a Fife Council programme of land disposal.

Confederation of St Andrews Residents Associations (3687): This site is also currently in use for its designed purpose. It can only be declared surplus to requirements if a satisfactory replacement strategy is reliably in place.

J Watchman (2529): Questions where the Design and Development Principles document can be accessed.

John Birkett (2783): A large iconic building converted into a hotel as proposed, would totally transform South Street's current character.

St Andrews Environmental Protection Association Ltd (3747): Concern that there may be a temptation to allow the highest value uses or an inappropriate intensity of such uses.

St Andrews Environmental Protection Association Ltd (3747): There will be great local objection to any future commercial and/or residential plans for this site. This is a
Grade A listed building.

Royal Burgh of St Andrews Community Council (2011): Object to the creation of a strong visual entrance to the Madras College site through Queens Terrace. There are too many cars parked in this area. Queens Terrace and Queens Gardens would need to be made Double Yellow Lined in order to provide adequate driving to this entrance. The town cannot afford to lose more parking spaces.

Confederation of St Andrews Residents Associations (3687): Neither Queens Gardens or Queens Terrace can accommodate traffic that would be generated by such a development.

P M Uprichard (2790), St Andrews Environmental Protection Association Ltd (3747): Queen’s Terrace is unsuitable for HGVs and vehicular access to the site. Queens Terrace represents a roundabout route which will not be the desired way for much vehicular traffic.

Confederation of St Andrews Residents Associations (3687): Proposed uses for this site are inappropriate. The University is interested in acquiring this site and utilising it for educational use. It is ideally located and could adapt well for tertiary education purposes. Commercial use would not provide an acceptable future use for this iconic building which is a valued part of the St Andrews heritage.

John Birkett (2783), St Andrews Environmental Protection Association Ltd (3747): The building should be kept, as intended by its founder, Andrew Bell, in educational use in the future.

STA 006: St Leonards

Robertson Homes (3725): The description for STA 006 should be changed from “Housing/Hotel” to refer only to “Housing”, with the stated estimated capacity increased to 280. The development requirements text should be amended to allow for a variety of potential housing tenures and types of residences and to remove reference for a hotel use, as this has been proven to be an undeliverable use in this location. Attempts to market the site for hotel uses have not brought a formal and viable offer for the site, with responses highlighting site size, location within St Andrews, lack of roadside presence and close proximity of new residential properties as issues. Recent planning permissions for hotel development elsewhere in the town mean that demand is limited.

J Watchman (2530), P M Uprichard (2793): There is a reference to housing of 240 units. It is questioned what this number refers to. The site has already been significantly redeveloped providing a number of units in excess of the indicative capacity in the 2012 Adopted Local Plan.

SEPA (3640): Support the inclusion of a Site Requirement for a buffer strip along the watercourse as this measure will help protect and improve the water environment.

STA 007: St Leonards Lodge

J Watchman (2531): Are the Employment Land contributions secured by Fife Council for the redevelopment of New Park School and the redevelopment of the abattoir site at Largo Road going to be used to secure the purchase of St Leonard’s Lodge?
STA 008: Strathtyrum

Royal Burgh of St Andrews Community Council (2003): Oppose the development of another hotel in the town on the Strathtyrum Estate. There are more than enough hotels in the burgh at present, and there is no need for an additional hotel in this location.

J Watchman (2532): This proposal is carried forward from the 2012 Adopted Local Plan and is supported.

SEPA (3641): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken. Support the inclusion of a Site Requirement for a buffer strip along the watercourse as this measure will help protect and improve the water environment.

STA 009: Fleming Place, Kinnessburn and Park Street

J Watchman (2533): This proposal is supported.

STA 010: Hepburn Gardens


Hepburn Gardens Area Residents Association (2178), Robert Fraser (1442): Support the proposal to extend the Hepburn Gardens Conservation Area as proposed in the Hepburn Gardens Conservation Area Appraisal and Management Plan. Concern that the plan not mention the north side of Hepburn Gardens west of Middleshade Road. This area, which is of significant importance architecturally and in terms of streetscape, is presumed to be included within the new boundaries. Suggest that the text is adjusted to reflect this.

STA 011: West Sands

J Watchman (2535): The application for planning permission (14/02756/FULL) for a visitor centre was recently refused. That decision is subject of an appeal (DPEA reference PPA-250-2210).

SEPA (3276): Suggest including within the site requirements a requirement for high quality SUDS to ensure that the development will not adversely affect the integrity of the Firth of Tay and Eden Estuary SPA/SAC and designated bathing waters.

STA 012: Botanic Gardens

J Watchman (2536): Is housing one of the preferred uses?

STA 013: Pipeland Farm

Dorothy Sneddon (2280), St Andrews Environmental Protection Association Ltd (2340), Dr Clive Sneddon (2265), J Watchman (2537), John Birkett (2785): The site is the subject of a legal challenge. It is premature to include the site.

Royal Burgh of St Andrews Community Council (2006): The proposed development will
create problems for surrounding properties and Largo Road traffic.

Elizabeth Williams (2082), Dorothy Sneddon (2280), John Birkett (2785): Object to this proposal on the grounds that the land has recently been designated as green belt.

Elizabeth Williams (2082), Dr Clive Sneddon (2265), Dorothy Sneddon (2280): Concerns raised regarding drainage problems in this location.

James Rough (613), Elizabeth Williams (2082): Consider the site to be in an unsuitable location for the majority of school children. Upwards of 60% of pupils have to be bussed in from North Fife.

Royal Burgh of St Andrews Community Council (2006), St Andrews Environmental Protection Association Ltd (2340), J Watchman (2537), John Birkett (2785), P M Uprichard (2796), Confederation of St Andrews Residents Associations (3761): It is inappropriate to take the site out of the St Andrews Green Belt and to include the site within the settlement boundary. Granting planning permission for development in the Green Belt does not mean that the site should be removed from the Green Belt. Planning permission has recently been granted for development in the green belt at Feddinch and this did not lead to the relevant land being taken out of the Green Belt. The current Green Belt boundary is based on the contours of the land.

John Picton (2744), Dr Clive Sneddon (2265), Dorothy Sneddon (2280), St Andrews Environmental Protection Association Ltd (2340), J Watchman (2537), Confederation of St Andrews Residents Associations (3761): Object on the basis that the proposals will pave the way for further development at the southern hillside and other greenbelt locations. The eastern boundary will not establish a defensible Green Belt boundary.

St Andrews Environmental Protection Association Ltd (2340), J Watchman (2537): The stated area of 12.8ha exceeds the area (12.7ha) which has planning permission in principle. An audit of the proposed site allocated and the application site should be undertaken.

St Andrews Environmental Protection Association Ltd (2119) J Watchman (2524): Concern that there is little if any room for expansion at the proposed community use secondary school at Pipeland Farm.

Elizabeth Williams (2082): The site is unsuitable for school playing fields because of the slope.

P M Uprichard (2796): Development of this site will prevent the future expansion of the Community Hospital, despite significant planned housing growth in the town.

Elizabeth Williams (2082): Close proximity to the hospital and hospice will generate unacceptable issues of noise.

Dr Clive Sneddon (2265): Question why this site is supported, given the findings of the site assessment of the larger candidate site LDP-STA002. Accepting the school site may leave the rest of candidate site LDP-STA002 open to appeal.

Dr Clive Sneddon (2265): The site extends the southern boundary of St Andrews into rural and green belt areas without showing compliance with existing policies.
John Birkett (2785): If the school is to be sited at Pipelands Farm, the Council should ensure that design and materials are of a standard that will enhance the site in terms of its Green Belt status. The current proposal is not of such a standard.

P M Uprichard (2796): I do not believe it is correct to say that there will be development of ‘...a high quality landscape edge along the northern boundary’. It will not be defensible or high quality.

James Rough (613): There is a need to continue to carefully consider all the options to give the best outcome for all the children in this part of Fife as well as St Andrews.

Dr Clive Sneddon (2265): Could a new school in the Tay Bridgehead be required? The Council needs to consider the educational arguments for or against local schools, and the educational benefits or otherwise of a long commute to school.

Dorothy Sneddon (2280): There should be a new school at the Tay Bridgehead. The South Street site should be retained and redeveloped for pupils and residents of the St Andrews area.

Elizabeth Williams (2082): Recommend re-allocating this proposal on the north-west edge of town, e.g. next to the University's North Haugh campus, thereby facilitating transport problems and promoting academic liaisons between school and university.

SEPA (3642) supports the inclusion within the Development Requirements for:

- a Flood Risk Assessment (FRA) to be undertaken;
- a buffer strip along the watercourse, as this measure will help protect and improve the water environment;
- the requirement to consider through a feasibility study, the potential for restoration and improvement of the water environment through the site design; and
- high quality SUDS.

Sites (not in the Proposed FIFEplan) proposed by Objectors

East Sands

University of St Andrews (2202): The objectives for the wider East Sands area, as originally communicated through the East Sands Urban Design Framework have resulted in improvements to the general area, however there is still significant potential to be realised from the area, and this potential should be recognised in the FIFEplan Proposed Plan through a designation, or at the very least acknowledgement of the potential opportunity in the supporting text of the Proposed Plan. The University is currently reviewing the future strategy for its assets in the area, and is currently in the process of preparing a masterplan to consider potential future development, redevelopment and disposal options. There is a need to promote a coordinated approach to future development options reflecting the objectives of the Urban Design Framework updated to reflect current land use objectives and prevailing market conditions.

J Watchman (2524): The mixed use allocation in the Adopted Local Plan (STA 08: East Sands and Harbour Improvement Area), which is supported by an Urban Design Framework, has not been taken into FIFEplan. No narrative has been provided about
why this has not been progressed.

Canongate (former New Park School playing fields)

BDW Trading Ltd (1713, 1847): Promote land at Canongate (the former New Park School playing fields) as suitable for a residential allocation of 30 houses. A Proposal of Application Notice has been submitted. There is a lack of immediately available housing land in St Andrews, and a shortfall in supply in the housing market area. In the Finalised (Unpublished) St Andrews & East Fife Local Plan 2006 the site was identified as suitable for up to 10 houses interspersed with public open space, multi-use pathways and landscaped amenity areas. At Examination the Reporter recognised that the field serves an amenity and recreational purpose, but also noted that the site could be developed satisfactorily for housing. The site is free from constraints and deliverable. A supporting statement is attached.

Brian Gray (174), Giles Irvine (231), Tim Butler (648), Susan Sinclair (801), Caroline Belanger (833), Joan Dowie (834, 1075), Brígita Irvine (937), Dr Jean Stewart (1214), T H & Sonia Daniels (1283), Suzanne Fernie (1336, 1364), Professor John Fernie (1399), Hope Park & Martyrs Church (1551), Royal Burgh of St Andrews Community Council (2001), Rita Cornfield (2123), Hepburn Gradens Residents Association (2240), Gordon Fraser (2341), Kenneth Fraser (2342), Susan & Robin Bell (2346), Louisa Culpin (2738), Henrietta M T Phillips (2986), Susan Sinclair (3466), Kingsley Smith (3933): Seek the retention of land comprising the former New Park School playing fields as protected open space for one or more of the following reasons:

- This area was previously a Playing Field which gave it a special status and the presumption should always be that development does not take place.
- The site designated as protected open space in the adopted Local Plan, following a recommendation at examination.
- The site is an important recreational area.
- The site is a well-used access route, and contains a right of way.
- The site supports a range of fauna and flora, including rare and protected species.
- The site is attractive and forms an extension of the Lade Braes.
- It would lead to loss of a precious open space in the urban area. There is a lack of similar open space in the surrounding area.
- The site includes valued trees.
- Impact on air quality.
- Better infill sites are available.
- There are sufficient other housing sites allocated.
- Understood that the site was left for the use of the town’s people in perpetuity.

Michael Joy (792): If land comprising the former New Park School playing fields is developed the established pathway at the northern end of the site should remain available for public access.

STRATHKINNESS

STK 003: Bonfield Road

Avant Homes (3701): Submission supports the allocation of STK 003 for 50 homes. The Council has set out the brief and mitigation measures for this expansion in the
Strathkinness Settlement Plan. Avant Homes supports the development strategy for Strathkinness as shown in the Proposed Plan and has completed an Education Impact Assessment. This confirms that the pupils from the proposal can be accommodated without the need for phasing. Accordingly, Avant Homes recommends the reference to the need for a phased approach to the development is modified from ‘will’ to ‘may’. The proposal is in a sustainable location. This site has the landscape capacity to accommodate the scale of development proposed. Its allocation will assist the Council meet its housing land requirement, helping maintain a 5 year effective housing land supply as required by SESplan and Scottish Ministers.

Bruce Sinclair (646): Strathkinness has had substantial development in recent years. Surely the time has come to call a halt? While I welcome Fife Council’s modest expansion of affordable Housing STK 002 adjacent to the STK 003 site, there is no justification to open up the adjacent farmland for major development. Major issues to be addressed include drainage and access, and pressure on the local primary school. The site assessment also highlights a number of negative points raised through earlier consultation relating to candidate sites in Strathkinness e.g. scale of development and impact on infrastructure. Concern about the urbanisation of the village, and the encouragement of ribbon development between Bonfield Road and the High Road. This site should remain outside the village envelope. Development is being promoted by a developer, rather than a considered response by the Council based on local needs.

Stewart Milne Homes (1717, 1809): Consider that land at Bonfield Road is non-effective and has landscape/access issues.

Stewart Milne Homes (1717, 1809): Submission in support of land on the southern edge of Strathkinness (candidate site LDP-STK003), in preference to the allocation of land at Bonfield Road. Part of the site was previously promoted through the St Andrews and East Fife Local Plan. It is now appropriate to carry out a full review/analysis of the settlement again and establish the logical direction for growth. It is requested that the site be identified as a predominantly housing led, mixed use proposal to effectively plan for the immediate, medium and long term future of Strathkinness and assist in the continued evolution of a sustainable mixed community and meet the requirements of SPP in providing a variety and choice of sites in marketable locations. Supporting Statement attached.

COUNTRYSIDE AREA

LWD 021: Craigtoun Country Park

SEPA (3265): A number of watercourses are present on site therefore we encourage you to include within the site requirements a requirement for a buffer strip along the watercourses which will help protect and improve the water environment.

Blazon Investments Ltd (14): objects to the non-allocation of land for housing at Kinaldy Meadows (candidate site LDP-LWD010), south of St Andrews, indicating that six holiday chalets and a manager’s house could be built by fully implementing an extant planning application. Cameron Community Council (107) supports the FIFEplan position of not
including Kinaldy Meadows as a housing proposal however, citing previous planning application refusals and an appeal that was dismissed by the Directorate for Planning and Environmental Appeals.

A Riach (1944): objects to the non-allocation of Northbank Farm, Cameron previously allocated as Proposal LW4 07 in the St Andrews and East Fife Local Plan for a mixed use development with an estimate of 15 houses. There is an extant permission for this site for commercial, leisure development including retail, exhibition, cafe/restaurant, visitor centre, craft workshops, 15 dwellinghouses, 20 holiday units, access road, drainage infrastructure and demolition of existing buildings at Northbank Farm. A matters specified by conditions application is currently being progressed and will be submitted to Fife Council before the permission expires on 8th March 2015.

**Modifications sought by those submitting representations:**

**ST ANDREWS**

St Andrews Issues

J Watchman (2524):

- more employment required.
- more affordable housing required.

J Watchman (2524), P M Uprichard (2784):

- reduce requirement for hotels.
- reduce requirement for student accommodation.

J Watchman (2524): more protected open space required.

St Andrews Environmental Protection Association Ltd (2340), J Watchman (2524): review status of protected open space at Station Park.

Old Course Hotel (3914): The Old Course Hotel request a modification to the green belt boundary defined within the Proposed Plan’s St Andrews Settlement Plan (as shown in the map attachment to this representation).

Suzanne Fernie (1336), St Andrews Environmental Protection Association Ltd (2119): none stated.

STA 001: St Andrews West

Headon Developments (1879):

- Amend the following text:

  "all housing and commercial development within the SDA requires to contribute on an equitable basis to the essential community infrastructure, including transportation and employment land."
such that it reads:

“all housing and commercial development within the SDA requires to contribute on an equitable basis to all infrastructure required for the SDA, including transportation and employment land. All housing will be built out on a pro rata basis.”

- Establish a development limit at Craigtoun of 150 units with a limited annual pro rata build rate.

Beebe Land Ltd (1154): Amend the St Andrews West Development Requirements as follows:

“………………………………using CHP/renewable technology.
Class 4 employment land may be integrated with other uses, including housing, hotel accommodation and restaurant/pub, care home.
Local retail opportunities in each of the three “hubs” should include:
University- 400sqm gross;
Strathkinness-200sqm gross;
Craigtoun- 2000sqm (food retail) gross.
A new community primary school with associated recreation and play facilities so as to meet capacity needs arising within the next 20 year (Justification: to reflect current educational requirements for education provision in local catchment areas);
5 ha business park (Class 4).
10 ha research and development or Science Park related enterprise.
8 ha employment land- Classes 4 (business), 5 (general industry) & 6 (storage and distribution) having regard to residential amenity and appropriate land use distribution. This will include a minimum of 6.8ha at the North Haugh area and 1.2ha at Craigtoun.
Road link between A91 and Craigtoun……………………..”

Michael Vernon (653): Relocate any employment land at Craigtoun to the north, adjacent to the new proposed road link.

Beebe Land Ltd (1346, 3906): Allocate 13ha of land to the West of the Craigtoun (North) and amend the inner Green Belt boundary accordingly.

Dr Fiona Vincent (1563): Delete proposal STA 001.

Rita Cornfield (2115, 2263): Delete proposal STA 001. If proposal remains any development between Craigtoun Road and Melville Road should be lower density, with high standards for drainage that should be controlled and monitored.

Michael Vernon (653), J Watchman (2525), P M Uprichard (2787), Scottish Enterprise (1047), SEPA (3636) and NHS Fife (3857): none stated.

STA 002: Grange Road

University of St Andrews (2204): The developer requirements should be amended by the addition of the following wording:

“Partnering opportunities for the delivery of tied University housing on the site can be considered through subsequent planning applications, provided the general
principles of the site allocation are adhered to and the dominant use remains University related. As with the student residential use, suitable legal agreements would provide protection against conversion to mainstream residential use for any tied University housing.”

Dr Clive Sneddon (2266), J Watchman (2526) and Dr Neill Travers (3509): Delete proposal STA 002.

Scottish Environment Protection Agency (3638): none stated.

STA 003: New Park School

J Watchman (2527): Remove reference to Class 4 uses.

P M Uprichard (2798): none stated.

STA 004: Madras College, Kilrymont

J Watchman (2528), Confederation of St Andrews Residents Associations (3688), St Andrews Environmental Protection Association Ltd (3746), Dr Clive Sneddon (3748): Remove proposal STA 004.

The Scottish Environment Protection Agency (3639): none stated.

STA 005: Madras College, South Street

J Watchman (2529), John Birkett (2783), Confederation of St Andrews Residents Associations (3687), Dr Clive Sneddon (3749), St Andrews Environmental Protection Association Ltd (3747): Remove proposal STA 005.

Royal Burgh of St Andrews Community Council (2011), P M Uprichard (2790), Confederation of St Andrews Residents Associations (3687), St Andrews Environmental Protection Association Ltd (3747): Amend plan to remove reference to Queens Terrace as an entrance to the site.

John Birkett (2783), St Andrews Environmental Protection Association Ltd (3747): Amend plan to retain site in educational use.

STA 006: St Leonards

Robertson Homes (3725): Amend description and developer requirements for STA 006 to remove reference to Hotel provision, and increase estimated capacity increased to 280.

J Watchman (2530) and P M Uprichard (2793): Review capacity figure of 240 units.

SEPA (3640): none stated.

STA 007: St Leonards Lodge

J Watchman (2531): none stated.
STA 008: Strathtyrum

Royal Burgh of St Andrews Community Council (2003): Remove proposal for hotel use on this site.

J Watchman (2532) and SEPA (3641): none stated.

STA 009: Fleming Place, Kinnessburn and Park Street

J Watchman (2533): none stated.

STA 010: Hepburn Gardens

J Watchman (2534), P M Uprichard (2799): none stated.

Hepburn Gardens Area Residents Association (2178), Robert Fraser (1442): Amend text to refer to land on the north side of Hepburn Gardens west of Middleshade Road.

STA 011: West Sands

J Watchman (2535): none stated.

SEPA (3276): Amend developer requirements to include a requirement for high quality SUDS.

STA 012: Botanic Gardens

J Watchman (2536): Clarify whether housing is one of the preferred uses for this proposal.

STA 013: Pipeland Farm

James Rough (613), Royal Burgh of St Andrews Community Council (2006), Elizabeth Williams (2082), Dorothy Sneddon (2280, 2280), Clive Sneddon (2265), St Andrews Environmental Protection Association Ltd (2119, 2340), J Watchman (2524, 2537), John Picton (2744), John Birkett (2785), P M Uprichard (2796), Neill Travers (3510), Confederation of St Andrews Residents Associations (3761): Delete proposal.

Royal Burgh of St Andrews Community Council (2006), St Andrews Environmental Protection Association Ltd (2340), J Watchman (2537), John Birkett (2785), Confederation of St Andrews Residents Associations (3761): Retain the site within the green belt, even if allocated within the plan.

Elizabeth Williams (2082), Neill Travers (3510): Re-allocate site on the north-west edge of town, e.g. next to the University's North Haugh campus.

Sites (not in the Proposed FIFEplan) proposed by Objectors

East Sands

University of St Andrews (2202): The potential benefits to the East Sands area through redevelopment and improvement to University assets in this area should be
acknowledged by the Proposed Plan. It is suggested that the area is identified as a “Development Opportunity” or similar such that encouragement of appropriate redevelopment and reuse opportunities can be supported through the content of the plan.

J Watchman (2524): The mixed use allocation in the Adopted Local Plan (STA 08: East Sands and Harbour Improvement Area), which is supported by an Urban Design Framework, should be a proposal in FIFEplan, or a narrative provided to explain why this has not been progressed.

Canongate (former New Park School playing fields)

BDW Trading Ltd (1713): Allocate land at Canongate (the former New Park School playing fields) for a residential allocation of 30 houses.

Brian Gray (174), Giles Irvine (231), Tim Butler (648), Susan Sinclair (801), Caroline Belanger (833), Joan Dowie (834, 1075), Brigita Irvine (937), Jean Stewart (1214), T H & Sonia Daniels (1283), Suzanne Fernie (1336, 1364), John Fernie (1399), Hope Park & Martyrs Church (1551), Royal Burgh of St Andrews Community Council (2001), Rita Cornfield (2123), Hepburn Gradens Residents Association (2240), Gordon Fraser (2341), Kenneth Fraser (2342), Susan & Robin Bell (2346), Louisa Culpin (2738), Henrietta M T Phillips (2986), Susan Sinclair (3466), Kingsley Smith (3933): Seek the retention of land comprising the former New Park School playing fields as protected open space.

Michael Joy (792): If land comprising the former New Park School playing fields is developed the established pathway at the northern end of the site should remain available for public access.

STRATHKINNESS

STK 003: Bonfield Road

Avant Homes (3701): Amend reference to the need for a phased approach to the development from ‘will’ to ‘may’.

Bruce Sinclair (646) and Stewart Milne Homes (1717, 1809): Remove proposed site at Bonfield Road and exclude this land from the settlement boundary.

Sites (not in the Proposed FIFEplan) proposed by Objectors

Stewart Milne Homes (1717, 1809): Replace allocation at Bonfield Road with land to the south of Strathkinness.

COUNTRYSIDE AREA

LWD 021: Craigtoun Country Park

SEPA (3265): Include within the site requirements a requirement for a buffer strip along the watercourses.
Sites (not in the Proposed FIFEplan) proposed by Objectors

Blazon Investments Ltd (14): Allocate land for housing at Kinaldy Meadows (candidate site LDP-LWD010, south of St Andrews.

Cameron Community Council (107): none stated.

A Riach (1944): Allocate land at Northbank Farm, Cameron previously allocated as Proposal LW4 07 in the St Andrews and East Fife Local Plan for a mixed use development with an estimate of 15 houses.

Summary of responses (including reasons) by planning authority:

ST ANDREWS

St Andrews Issues

St Andrews Environmental Protection Association Ltd (2119 & 2340), J Watchman (2524), and P M Uprichard (2784): The Settlement Plan for St Andrews in the Proposed Local Development Plan represents a continuation of the strategies set out in the adopted St Andrews and East Fife Local Plan (2012) and the adopted TAYplan Strategic Development Plan (2012). The Proposed Local Development Plan carries forward proposals to focus development to the west of the town through the St Andrews West Strategic Development Area (proposal STA 001).

The level of growth proposed for St Andrews is considered to be appropriate to its identification as a Tier 2 principal settlement in TAYplan Strategic Development Plan.

Potential development opportunities have been added to reflect the potential for brownfield sites within the town at the existing Madras College sites on South Street and at Kilrymont, as a result of Fife Council’s intention to build a new single campus school at Pipeland Farm (proposal STA 013), as well as smaller-scale opportunities at West Sands and the Botanic Gardens intended to support the role of these existing attractions.

Housing need for the St Andrews and North East Fife Housing Market Area has been assessed through the TAYplan-wide Housing Need and Demand Assessment (2010) that informed the housing requirement for the housing market area in the Strategic Development Plan. More detailed local assessment of housing issues relating to St Andrews specifically, include the ‘Growing Economies and Building Homes: Reconciling Growth And Housing Wellbeing In St Andrews’ (2013) study commissioned to CHR by Fife Council and the University of St Andrews, which considered the relationship of the university’s student population and the towns housing market. These studies have informed the proposals set out in the plan. Matters of student accommodation and HMO provision are addressed in Issue 2B Homes.

Issues relating to housing land are also dealt with under Issue 2B Homes.

In line with Local Development Plan Policy 2 ‘Homes’ Figure 2.2, at least 30% of any housing development in this area will be affordable housing, and the Council’s Supplementary Guidance on Affordable Housing provides detailed guidance on how
affordable housing will be achieved and contains details of the mechanisms through which Affordable Housing will be kept affordable to meet the future needs of local people.

Whilst, by the nature of Local Development Plan consultations, it is not possible to accede to all requests for changes to the Plan made by respondents and objectors (many of which are mutually exclusive), representations made at all stages of the Local Development Plan process are taken into account by planning officers, and each iteration of the Plan is subject to approval by Fife Council Committees.

In addition to new housing, the Proposed Local Development Plan provides for a significant amount of land for employment development, primarily contained within the Strategic Development Area, but also in proposals for Strathclyde (STA 008) and St Leonards Lodge (STA 007).

In relation to comments regarding the demand for additional hotel development in St Andrews, the ‘Tourism Development Framework for Scotland… role of the planning system in delivering the visitor economy’ (see Supporting Document SD1, paragraph 2.71) identifies gaps in tourist accommodation around locations including St Andrews. The Hotel Development Study – Fife report, May 2012 (see Supporting Document SD2, paragraphs 2.1 and 2.1.3) findings suggest ‘a perceived lack of available accommodation in St Andrews in peak season’ and that ‘Key players in the hotel development cycle have largely positive views about St Andrews, although seasonality is a major issue…’. The report also highlights potential sites for hotel development at Craigtoun Hospital, Strathclyde House Estate, St Leonards and Memorial Hospital and Northbank Farm, Cameron.

Regarding the perceived shortfall of public open space in St Andrews, the Fife Greenspace Strategy 2011-16 (see CD32, page 42) notes that whilst St Andrews has a number of good quality greenspaces, there are greenspaces in the town that would benefit from improvements, and the quantity of greenspace is below average in the town. Green network priorities have been identified for a number of proposals within the town that highlight the protection and/or creation of greenspaces.

In relation specifically to Station Park, the Council considers Station Park playing fields to be an important open space on one of the main approaches to the town. There is no proposal to change the designation of Station Park as protected open space.

Development proposals in the St Andrews Green Belt will be considered against the provisions of Policy 9 ‘Green Belt’. Issues relating to the policy are addressed under Issue 2F: Countryside. Together with Policy 1 'Development Principles', these policies will protect the aims and objectives of green belt designation.

Issues relating to the proposed new High School at Pipeland Farm’ and related education issues are addressed below under “Proposal STA 013”.

Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision.
Comments from Miss Uprichard relating to listed buildings and the monitoring of planning application conditions are noted. Fife Council seeks to provide a pro-active roll in identifying issues with listed buildings and monitoring conditions on planning applications where possible. However, realistically given the Council’s resources there will be some reliance on others to highlight issues.

No changes are proposed in relation to the above issues.

Old Course Hotel (3914): The Old Course Hotel has requested an amendment to the green belt boundary in relation to land south west of St Andrews, between Denhead and Feddinch (as shown in the map attachment to this representation).

The area of land in question was identified in the ‘Landscape Capacity Assessment and Proposed Green Belt Study of St Andrews’ (2003) report (see Supporting Document SD3, page 49), as part of an area with the following characteristics:

- Area of high scenic quality which is also the main focus of recreation infrastructure.
- Important component of landscape setting providing a wooded backdrop to the south west edge of the settlement.
- The boundary is located to maintain the integrity of the Hills and Dens landscape character which contributes most significantly to the setting of St Andrews.

On this basis it is considered appropriate to retain this area of land within the St Andrews green belt.

Suzanne Fernie (1336): Comments relating to the consultation process are addressed in the FIFEplan Statement of Conformity (see CD45).

STA 001: St Andrews West

No changes are proposed in relation to this proposal.

Headon Developments (1879): The Craigtoun area forms part of the St Andrews West Strategic Development Area. These allocations are set out in the TAYplan Strategic Development Plan, to which the Local Development Plan must conform. The Strategic Development Areas have been verified through the Strategic Development Plan processes. It is therefore legitimate to bring forward proposals for this area. Development of this area has to be delivered in accordance with the overall framework for the whole site. Delivery of the St Andrews West Strategic Development Area is a key part of both the FIFEplan and TAYplan strategies.

Beebe Land Ltd (1154) and Mr Michael Vernon (653): The employment land requirements for site STA 001 have been carried forward from the adopted St Andrews and East Fife Local Plan (2012). These include a 5Ha business park, a 10Ha research and development or Science Park and an additional 8Ha of general employment land (Classes 4, 5 and 6). The Proposed FIFEplan Local Development Plan states that the 8ha allocation of employment land is to be spread across the SDA as per the development framework. The Adopted TAYplan Strategic Development Plan includes a requirement within the St Andrews West Strategic Development Area for a 10ha Science Park and 10ha of general employment land.

Other than St Andrews SDA allocation, there is a minimal amount of employment land
allocated in the town itself. The only other employment land allocations in St Andrews are 1) St Leonard's Lodge - due to be constructed and open in 2015 and 2) Strathclyde, which has been identified as a mixture of Hotel and Research/Class 4 Employment, therefore will only provide an unknown quantity of employment land. A relatively small site at Bassaguard was recently redeveloped for employment use. It only has one available unit left that is currently under offer. Therefore there is a need for effective employment land within the St Andrews area. Pre-application discussion and Proposal of Application Notice (14/03322/PAN) included employment land as part of the proposal for the Craigtoun element of the SDA.

Beebe Land Ltd (1346 & 3906): The Proposed Local Development Plan allocates land for housing across the St Andrews & North East Fife Housing Market Area, sufficient to meet statutory requirements.

Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with under the Homes Schedule 4 (2B) and its associated supporting paper. All sites identified for housing development in the Proposed Local Development Plan have been the subject of site assessments. At this time, there is no need to allocate, for housing, the site which is the subject of these representations. This candidate site (LDP-STA001) proposed an extension to the St Andrews West Strategic Development Area. The Proposed Local Development Plan carries forward the existing site boundary from the adopted Local Plan in order to protect the recently established St Andrews greenbelt.

Fife Council is committed to protecting the landscape setting of St Andrews, through the continued identification of the St Andrews green belt and a policy framework that protects against inappropriate development.

Options for strategic development in St Andrews were relatively recently considered through the Local Plan examination. The additional land proposed is not supported.

The site assessment for this site is considered to highlight issues relevant to this site. The site appraisal recognises in the Post Consultation Summary that a revised site boundary was submitted, reducing the site area. Fife Council supports maintaining the existing St Andrews green belt boundary, which has only relatively recently been established through the adopted St Andrews and East Fife Local Plan (2012). Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with under the Homes Schedule 4 (2B) and its associated supporting paper.

Dr Fiona Vincent (1563) and Rita Cornfield (2115, 2263): The principle for development on this site was set through the adopted St Andrews & East Fife Local Plan examination. Fife Council has a statutory duty to ensure that the FIFEplan Local Development Plan (LDP) conforms to the TAYplan Strategic Development Plan before it can be adopted. The Council must maintain at least a 5-year effective housing land supply in the St Andrews & East Fife Housing Market Area, and the Local Development Plan should identify sufficient sites to meet the housing land requirement for 10 years as detailed in the TAYplan/SESplan Strategic Development Plan.

Allocating a generous supply of land for housing across the Housing Market Areas in the Local Development Plan gives the flexibility necessary for the continued delivery of new housing should unpredictable changes to the effective housing land supply occur during the lifetime of the Local Development Plan. Issues relating to the amenity of existing
residents such as noise, nuisance, smell, privacy, daylight, boundary treatments, design/layout etc. would be addressed at the detailed planning application stage. Issues relating to access, drainage, landscape etc are in part addressed by developer requirements relating to the need to provide a Transport Assessment and Flood Risk Assessment, and would also be addressed at the detailed planning application stage.

Michael Vernon (653): Comments noted. The principle for development on this site was set through the adopted St Andrews & East Fife Local Plan examination. The aim of these proposals to be sustainable and to provide local centres to serve the proposed new housing.

J Watchman (2525): The proposed link road will help distribute traffic throughout the town which will reduce the need for some journeys through the town centre. A full transport assessment will be required and these issues will be addressed at that time.

P M Uprichard (2787): Comments noted. Community engagement will be undertaken as part of the planning application process.

Scottish Enterprise (1047) and SEPA (3636): Support for FIFEplan position is noted

NHS Fife (3857): Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision.

STA 002: Grange Road

University of St Andrews (2204): In the adopted St Andrews & East Fife Local Plan (2012) the Grange Road site in St Andrews was allocated for mainstream housing (ref: STA 03 - see CD9). The Proposed Local Development Plan identifies the site as a proposal for University related housing development. A University Village concept is proposed, whereby purpose built student housing (for both postgraduates and undergraduates) will be provided along with tied housing for researchers and for University staff.

The University of St Andrews supports the allocation STA 002, for Grange Road, St Andrews, subject to the inclusion of additional wording to provide the required flexibility to avoid restricting delivery options available to the University. The University has requested additional wording to provide flexibility to allow the opportunity to pursue development by way of partnership opportunities, potentially allowing other forms of affordable housing or mainstream housing development.

As highlighted above, the principle of mainstream housing on this site was previously identified as being suitable through the allocation in the adopted Local Plan. Proposed staff (tied) housing would also be subject of a legal agreement to make financial contributions towards affordable housing if it subsequently becomes mainstream housing. Such an approach is supported by the University in their comments on the plan.

Taking into account the University of St Andrews latest aspirations for the site, Fife Council considers that there is merit in including additional wording to the proposal as
set out below.

“Partnering opportunities for the delivery of tied University housing on the site can be considered through subsequent planning applications, provided the general principles of the site allocation are adhered to and the dominant use remains University related. As with the student residential use, suitable legal agreements will be required to prevent conversion of tied University housing to mainstream residential use. Proposed staff (tied) housing would also be subject of a legal agreement to make financial contributions towards affordable housing if it subsequently becomes mainstream housing.”

Fife Council invites the Reporter to make an appropriate recommendation on this issue.

J Watchman (2526): The site at Grange Road allows for delivery of university related housing development in the short-term, whilst the St Andrews West Strategic Development may take longer to come forward due to the scale and complexity of the proposals.

Proposal STA002 does not exempt staff housing from contributions towards planning obligations other than affordable housing. The details of such planning obligations are set out in the FIFEplan Planning Obligations Framework (March 2015) (CD46) and would be considered as part of any planning application.

Dr Clive Sneddon (2266): The site is within the settlement boundary and outwith the identified St Andrews green belt, and therefore does not set a precedent to develop the southern hillside of St Andrews.

Dr Neill Travers (3509): The proposals for the site include housing for a mix of undergraduate and postgraduate students and university staff, with the intention of creating a mixed community. This is considered appropriate in relation to adjoining residential areas.

The Health and Safety Executive have been consulted throughout the process of preparing the Local Development and have raised no objection to this proposal. The presence of a gas main will be considered through any future planning applications for the site.

Comments received have expressed concerns about potential flooding and drainage issues. The developer requirements for this site contain a range of measures to ensure that development will address flooding issues, whilst also ensuring the protection and potential improvement of the water environment. SEPA have supports the developer requirements set out in the plan for this proposal.

Detailed matters, relating to the specifications of road access and drainage arrangements will be dealt with at the planning application stage.

The North Haugh was one of alternative sites looked at for the new School and discounted in favour of the site at Pipeland Farm, as discussed under proposal STA 013: Pipeland Farm below.

SEPA (3638): support for the FIFEplan position is noted
STA 003: New Park School

J Watchman (2527) and P M Uprichard (2798): This site has planning permission for 21 dwellings. 12 of these have been completed to date. Green Network Priorities have been identified for the site which will apply should any planning applications come forward to amend development proposals for the site. Green network assets have been identified by Fife Council on and adjacent to the east/south east of the site. The requirement for a high quality landscape edge highlights that any future planning application would have to demonstrate that existing green network assets and their function would be protected and where possible enhanced.

Mr Watchman has highlighted that a financial contribution towards off-site employment provision was agreed by Fife Council in place of on-site employment provision through the planning application process. Fife Council considers that there is merit in removing reference within the developer requirements to Class 4 uses, to reflect the approved planning application position, and invites the Reporter to make an appropriate recommendation on this issue.

STA 004: Madras College, Kilrymont

J Watchman (2528), Confederation of St Andrews Residents Associations (3688), St Andrews Environmental Protection Association Ltd (3746), Dr Clive Sneddon (3748): Fife Council has approved planning applications (planning applications 13/02583/EIA and 14/02249/ARC) for a new replacement Madras secondary school at Pipeland Farm (proposal STA 013 in the Proposed Local Development Plan). A petition raised in the courts, questioning the legality of the decision to grant permission for the school, was subsequently refused following the outcome of a judicial review. The decision of the courts has now been challenged. The reasons for the latest challenge and timetable for it to be heard are unknown at time of writing.

Should the latest challenge be dismissed then, following completion of construction of a new school, the existing school campuses at Kilrymont and South Street will no longer be required for their existing use. Fife Council considers it sensible to start planning ahead to aim to ensure that new uses can be found for these potential brownfield sites as early as possible.

The Kilrymont School campus includes Category B listed buildings constructed in the 1960s. Any future proposal for redevelopment of the site will be required to take into consideration Historic Scotland’s Scottish Historic Environment Policy (2011).

In view of the surrounding residential area, housing and other compatible uses are considered to be appropriate uses on redevelopment of the site.

Options for the re-use of the listed buildings have not been explored at this time, but residential uses are not ruled out. Assuming the listed buildings can be retained there is also likely to be some scope for additional development or uses on remaining land within the site area, without adversely affecting the setting of the listed buildings.

It is Fife Council’s intention to prepare development briefs for both the Kilrymont and South Street sites, set within a strategy for the existing Madras School sites as a whole. Station Park (which comprises playing fields used by Madras School) is identified as protected open space in the Local Development Plan, and is important to the setting of
the town and the Old Course, but there may be issues relating to its use/management to be explored.

Fife Council has begun a process of working with Historic Scotland to more closely identify the historic environment assets and issues relating to the Kilrymont and South Street sites.

Continued work with Historic Scotland will inform the production of development frameworks for the existing Madras School sites. These frameworks will then be published for public consultation before being considered through Fife Council’s committee process, as a material consideration for future proposals for these sites. Fife Council considers that there is merit in highlighting the intention to produce development frameworks for proposals STA004 and STA005 in the developer requirements for these sites, and invites the Reporter to make an appropriate recommendation on this issue.

In response to Mr Watchman’s comments, the Council accepts that education use (Class 10) would be considered as one potential future use for the site through the development framework process, taking into account the existing educational use of the site.

The Scottish Environment Protection Agency (3639) support for FIFEplan position is noted.

STA 005: Madras College, South Street

J Watchman (2529), Confederation of St Andrews Residents Associations (3687), Dr Clive Sneddon (3749), St Andrews Environmental Protection Association Ltd (3747): Issues relating to the legal challenge to proposals for a new school at Pipeland Farm, and the implications of this in relating to the existing school sites at Kilrymont and South Street are addressed under our response to STA 004, above.

John Birkett (2783), St Andrews Environmental Protection Association Ltd (3747), J Watchman (2529), Royal Burgh of St Andrews Community Council (2011), Confederation of St Andrews Residents Associations (3687), P M Uprichard (2790), and John Birkett (2783): The South Street School campus, includes Category A and B listed buildings as well as a Scheduled Monument (St Andrews Blackfriars, Dominican Friary). The south part of the site contains non-listed buildings potentially suitable for redevelopment.

As referred to above in relation to proposal STA 004, it is Fife Council’s intention to prepare development briefs for both the Kilrymont and South Street sites, set within a strategy for the existing Madras School sites as a whole.

A Design and Development Principles document (referenced in the Local Development Plan) has been prepared for the South Street site. The document has no formal status and has not been put before Fife Council’s committee process, however, it has informed the general principles for the site in the Proposed Plan. The Design and Development Principles document will also inform the preparation of a development brief for the South Street site.

Protection of the built heritage of this site is central to the proposal set out in the Proposed Local Development Plan. The developer requirements state that new buildings
should be visually subservient to the remaining historic buildings and protect, where possible, the historic roofscape. The developer requirements state that Fife Council will promote an international design competition for the redevelopment proposal.

Concerns have been raised in the comments received over the reference in the developer requirements to create a ‘strong visual entrance’ to the site at Queen’s Terrace. The concerns relate to traffic and parking issues. The reference to a strong visual entrance, relates to creating an attractive gateway to the site, rather than describing the function of this access. Detailed matters, relating to the traffic, parking and road access will be dealt with at the planning application stage and as part of the design competition for the site.

Some comments have questioned whether there are title restrictions on the use of this site. The Council can confirm that it has title to the subjects of this site and that there are no restrictions on selling the subjects or the use of the subjects.

**STA 006: St Leonards**

Robertson Homes (3725), J Watchman (2530) and P M Uprichard (2793): Fife Council is currently in the process of assisting the site developer to secure a hotel operator in line with the approved Strategic Development Framework. Should a hotel prove to be undeliverable on the site, Fife Council will consider alternative appropriate uses.

This site has a number of planning approvals, and parts of the site are completed or under construction. The estimated capacity refers to the total number of houses (including those already complete or under construction) estimated to be built on the site as identified on the proposals map.

Scottish Environment Protection Agency (3640): support for FIFEplan position is noted.

No changes are proposed in relation to this proposal.

**STA 007: St Leonards Lodge**

J Watchman (2531): It is understood that the proposal will be funded by the development of the larger St Leonards site. No changes are proposed in relation to this proposal.

**STA 008: Strathtyrum**

Royal Burgh of St Andrews Community Council (2003): This proposal is carried forward from the 2012 Adopted St Andrews & East Fife Local Plan. The site is one of four sites highlighted by the Hotel Development Study – Fife report, May 2012 (see Supporting Document SD2, paragraph 2.1.3) as offering the highest potential to accommodate a need identified for more ‘affordable’ level hotel provision.

J Watchman (2532), SEPA (3641): Support for proposal STA 008 is noted.

No changes are proposed in relation to this proposal.

**STA 009: Fleming Place, Kinnessburn and Park Street**

J Watchman (2533): Support for Proposal STA 009 is noted.
<table>
<thead>
<tr>
<th>STA 010: Hepburn Gardens</th>
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<tr>
<td>J Watchman (2534), P M Uprichard (2799): Support for Proposal STA 010 is noted.</td>
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<tr>
<td>Hepburn Gardens Area Residents Association (2178), Robert Fraser (1442): This proposal is shown on the Local Development Plan mapping to include land west of Middleshade Road. The supporting text states clearly that the amended boundary would include ‘2-8 Middleshade Road and 69 Hepburn Gardens’. Fife Council considers that there is no need to amend the Local Development Plan in relation to this proposal.</td>
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<th>STA 011: West Sands</th>
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<tr>
<td>J Watchman (2535) and SEPA (3276): This proposal is for a replacement visitor and education centre at West Sands. An application for planning permission (14/02756/FULL) for a replacement visitor centre was refused by Fife Council’s North East Planning Committee on 12 November 2014 on the grounds of visual impact. An appeal (DPEA reference PPA-250-2210) was subsequently lodged. The reporter dismissed the appeal due to the visual impact of the design, scale and massing of the proposal. However, it was also noted by the reporter that the principle of replacing the current facilities on site is not in dispute. Fife Council therefore consider it appropriate to retain the proposal in the plan, to support the principle of future proposals for the site.</td>
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<tr>
<td>SEPA have suggested including within the site requirements a high quality SUDS to ensure that the development will not adversely affect the integrity of the Firth of Tay and Eden Estuary SPA/SAC and designated bathing waters. Fife Council considers that there is merit in including the wording suggested by SEPA in the developer requirements, to ensure greater protection of the European Protected site, and invites the Reporter to make an appropriate recommendation on this issue.</td>
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<th>STA 012: Botanic Gardens</th>
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<td>J Watchman (2536): This site is identified as an opportunity for sensitive, small-scale development that cross subsidises the long-term sustainable operation of the botanic gardens. The development requirements state that uses must be sympathetic and complementary to the continued role of the wider gardens area. The Council considers that housing uses would be unlikely to be considered favourably in this context. No changes are proposed in relation to this proposal.</td>
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<th>STA 013: Pipeland Farm</th>
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<tr>
<td>Dorothy Sneddon (2280), St Andrews Environmental Protection Association Ltd (2340), Dr Clive Sneddon (2265), J Watchman (2537), John Birkett (2785): Fife Council has approved planning applications (planning applications 13/02583/EIA and 14/02249/ARC) for a new replacement Madras secondary school at Pipeland Farm (proposal STA 013 in the Proposed Local Development Plan). A petition raised in the courts, questioning the legality of the decision to grant permission for the school, was subsequently refused following the outcome of a judicial review. The decision of the courts has now been challenged. The reasons for the latest challenge and timetable for it to be heard are unknown at time of writing.</td>
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<tr>
<td>Royal Burgh of St Andrews Community Council (2006), St Andrews Environmental Protection Association Ltd (2340), J Watchman (2537), John Birkett (2785), P M</td>
</tr>
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PROPOSED FIFE LOCAL DEVELOPMENT PLAN

Uprichard (2796), Confederation of St Andrews Residents Associations (3761): The
development of Pipeland represents an extension to the settlement, where the
development site is contiguous with the existing settlement boundary. In this case, it is a
matter of changing the existing settlement boundary to accommodate the Pipeland site,
as it makes more sense in this particular instance to have a school sit within the
settlement rather than sit within the Green Belt zoning.

With regard to some other sites where development occurred and the sites were not
taken out of the Green Belt, such as Feddinch, these were developments that sat apart
from the existing settlement, and which were not contiguous with the settlement
boundary. It therefore made more sense to include them within the Green Belt rather
than to “punch holes” into the Green Belt zoning – for Feddinch, for example, the
development of a golf course is something that sits comfortably within the Green Belt
and it is appropriate to maintain the greater control over such development that being
within the Green Belt zoning offers. That particular control is not required for the
Pipeland site, as it is a school development that more appropriately falls to be
considered under the suite of policies that apply to built developments within the
settlement boundary.

Elizabeth Williams (2082), Dorothy Sneddon (2280), John Birkett (2785), John Picton
(2744), Clive Sneddon (2265), St Andrews Environmental Protection Association Ltd
(2119, 2340), J Watchman (2524, 2537), Confederation of St Andrews Residents
Associations (3761), Royal Burgh of St Andrews Community Council (2006), James
Rough (613), P M Uprichard (2796) and John Birkett (2785): Issues raised by
respondents relating to the proposed new school at Pipeland have been addressed
through the planning application process and are set out in the relevant committee
reports (see Supporting Documents SD4 and SD5). The site boundary reflects the
approved planning application boundary. The minor difference in the site area stated on
the planning application (12.7ha) and the site area stated in the Proposed Plan (12.8ha)
represents minor variations in the measurement of the site area most likely as a result of
the intricacy of the site boundary.

SEPA (3642): support for FIFEplan position is noted.

No changes are proposed in relation to this proposal.

Sites (not in the Proposed FIFEplan) proposed by Objectors

East Sands

University of St Andrews (2202) and J Watchman (2524): Fife Council approved the East
Sands Urban Design Framework in September 2010 (see CD52). A proposal (STA 08
‘East Sands/Harbour Improvement Area’) contained within the adopted St Andrews and
East Fife Local Plan (2012) was not carried forward to the Proposed Local Development
Plan on the basis that the approved Urban Design Framework provides sufficient
guidance for any development proposals relating to this site. Fife Council considers,
however, that there is merit in including reference within the Settlement Plan for St
Andrews to the approved the East Sands Urban Design Framework, as this would be
helpful in highlight the document as being a key consideration in the determination of
proposals for the area, and invites the Reporter to make an appropriate recommendation
on this issue.
**Canongate (former New Park School playing fields)**

BDW Trading Ltd (1713), Brian Gray (174), Giles Irvine (231), Tim Butler (648), Susan Sinclair (801), Caroline Belanger (833), Joan Dowie (834, 1075), Brigita Irvine (937), Jean Stewart (1214), T H & Sonia Daniels (1283), Suzanne Fernie (1336, 1364), John Fernie (1399), Hope Park & Martyrs Church (1551), Royal Burgh of St Andrews Community Council (2001), Rita Cornfield (2123), Hepburn Gradens Residents Association (2240), Gordon Fraser (2341), Kenneth Fraser (2342), Susan & Robin Bell (2346), Louisa Culpin (2738), Henrietta M T Phillips (2986), Susan Sinclair (3466), Kingsley Smith (3933) and Michael Joy (792): BDW Trading Ltd are promoting land at Canongate (the former New Park School playing fields) as suitable for a residential allocation of 30 houses. A Proposal of Application Notice has been submitted.

The site was considered through the examination of the St Andrews and East Fife Local Plan. Whilst the Report of Examination provides some support for housing on this site, stating that the site could be developed satisfactorily for housing, it also states that the playing field does serve a valuable amenity and recreational purpose. It was for this reason that the Reporter directed that a protected open space zoning should be applied to the site.

Land at the former New Park School Playing fields has not been included within the Proposed Plan. This site did not come forward through the call for Candidate sites and has not been subject to consultation or site assessment. The land has been identified as protected open space, carrying forward the status of this site in the adopted St Andrews and East Fife Local Plan (2012).

The Proposed Local Development Plan allocates land for housing across the St Andrews and North East Fife Housing Market Area, sufficient to meet statutory requirements. Whilst all sites identified for housing development in the Proposed Local Development Plan have been the subject of site assessments, this site has not.

Development proposed for St Andrews in the plan is considered to provide sufficient growth to meet the needs of the town. As referred to above, the Fife Greenspace Strategy 2011-16 notes that the quantity of greenspace is below average in the St Andrews. For the reasons set out above this site is not supported for inclusion in the Plan.

**STRATHKINNESS**

**STK 003: Bonfield Road**

Avant Homes (3701), Bruce Sinclair (646) and Stewart Milne Homes (1717, 1809): This site has come forward through Fife Council’s candidate site process. The site in combination with proposal STK 002 (an affordable housing proposal carried forward from the adopted St Andrews and East Fife Local Plan) is considered to allow for an appropriate level of future growth for Strathkinness, with site STK 001 nearing completion. The site could contribute 50 houses towards meeting the TAYplan housing land requirement.

Sites STK 002 and STK 003 are considered to complement one another by providing improved road connections, and offering potential for shared infrastructure such as SUDs provision.
Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision. Detailed matters, such as the specifications of road access and drainage arrangements for example, will be dealt with at planning application stage.

In the case of education, it is noted that Avant Homes state that they have completed an Education Impact Assessment, which they consider confirms that the pupils from the proposal can be accommodated without the need for phasing. Avant Homes recommend the reference to the need for a phased approach to the development is modified from ‘will’ to ‘may’. The Education Impact Assessment does not form part of the submission from Avant Homes, and it is therefore not possible to comment on its findings. However, the Council acknowledges that should circumstances allow, there may not be a need to phase development of the site. Taking this into account, the Council considers that there may be merit in amending the wording of the developer requirements as suggested and invites the Reporter to make an appropriate recommendation on this issue.

Sites (not in the Proposed FIFEplan) proposed by Objectors

Stewart Milne Homes (1717, 1809): It remains Fife Council’s position that candidate site LDP STK 003 should not be allocated for development at this time. The Proposed FIFEplan LDP allocates land for housing across the various Housing Market Areas to meet statutory requirements, and the detail of this is dealt with in Issue 2B Homes. This proposal is not included within the Proposed Plan as it does not comply with the FIFEplan strategy, and in order to protect the recently established St Andrews greenbelt. The scale of development is considered too large for Strathkinness. The sites included in the Proposed Plan are considered to provide sufficient growth for Strathkinness over the local plan period.

COUNTRYSIDE AREA

LWD 021: Craigtoun Country Park

SEPA (3265): The Scottish Environment Protection Agency have identified in their comments that a number of watercourses are present on site and encourage the inclusion within the developer requirements a requirement for a buffer strip along the watercourses which will help protect and improve the water environment. Taking this into account, the Council considers that there may be merit in amending the developer requirements as suggested, and invites the Reporter to make an appropriate recommendation on this issue.

Sites (not in the Proposed FIFEplan) proposed by Objectors

Blazon Investments Ltd (14) and Cameron Community Council (107): It remains Fife Council’s position that candidate site LDP LWD010 should not be allocated for development at this time. The Proposed FIFEplan LDP allocates land for housing across the various Housing Market Areas to meet statutory requirements, and the detail of this is dealt with in Issue 2B Homes. This proposal is not included within the Proposed Plan as it does not comply with the FIFEplan strategy. The site has poor access to local
services, and proposed housing would be reliant on private transport. Planning application (10/00237/FULL) for "change of use and demolition of equestrian centre and the erection of five dwellinghouses and landscaping" was refused. An appeal (PPA-250-2097) was subsequently dismissed.

A Riach (1944): A Riach objects to the non-allocation of Northbank Farm, Cameron previously allocated as Proposal LW4 07 in the St Andrews and East Fife Local Plan highlighting that there is an extant permission for this site. Fife Council in preparing the Proposed Plan took the view that a proposal for mixed use development including a significant level of housing, would not in principle be consistent with the FIFEplan strategy in a countryside location such as this. It was therefore considered appropriate not to include the site, to prevent potential future inappropriate development in the countryside. This approach does not prevent the extant permission coming forward.

**Reporters conclusions:**

**ST ANDREWS**

**St Andrews Issues**

1. In so far as the issues raised in representations relate to specific allocations in the proposed plan, I have dealt with them below under the relevant heading for the allocation, including Pipeland Farm (STA 013), St Leonards (STA 006), and Strathtyrum (STA 008). In this section, I focus on general issues relating to St Andrews, and 2 site specific issues.

2. The overall adequacy of the supply across the plan area is considered in detail at Issue 2(b) Homes. Housing market areas, not individual settlements, are the geographical areas used to determine housing requirements, including housing need and specialist provision. Scottish Planning Policy explains that one of the roles of the planning system is to identify a generous supply of land for each housing market area to support the achievement of the housing land requirement. The council also indicates that it has taken into account in putting forward proposals for St Andrew's in the proposed plan, the 2013 report “Growing Economies and Building Homes: Reconciling Growth and Housing Wellbeing in St Andrews” by the Centre for Housing Research, which shows how the university impacts the local housing system.

3. St Andrew's is within the St Andrews and North East Fife Housing Market Area. TAYplan sets out the average annual housing market build rate required across the housing market area to ensure an appropriate supply of housing is provided. Affordable housing on the various housing allocations would have to be provided in line with Policy 2 of the proposed plan and the council's Affordable Housing Supplementary Guidance. I am satisfied that this represents a reasonable approach, and means that affordable housing will be provided in the town as allocations are built out. This approach to the provision of affordable housing through the planning system is broadly in line with the approach advocated by national guidance and advice.

4. St Andrew's University is a nationally and an internationally important university and centre of knowledge, and a successful academic enterprise. It is a significant employer and contributor to the regional economy, and helps provide a platform for the growth of the area. St Andrew's and the surrounding area are also an important golf and tourist
destination, and the 2013 “Tourism and Development Framework for Scotland...role of the planning system in delivering the visitor economy” by Visit Scotland describes St Andrew’s, along with various other destinations, as a “honey pot” location. As such, the town has an important part to play in securing the economic competitiveness of the region. To this end, TAYplan recognises it as a tier 2 settlement. These settlements are defined as having “the potential to make a major contribution to the regional economy but will accommodate a smaller share of the region’s additional development.”

5. The economic importance of St Andrews to the area, and the role envisaged for it by TAYplan should not be overlooked. It is therefore appropriate that it provides a range of development opportunities, including allocations for both housing and employment uses. Inevitably, this could result in increased stresses on services and infrastructure, but further assessments would be required, and these would highlight any necessary mitigation. I accept the council’s view that where stresses have been identified, provision could likely be made to mitigate the effects of proposed development, and Policy 4: Planning Obligations of the proposed plan (and Policy 8: Delivering the Strategic Development Plan of TAYplan) could be used to require developer contributions where appropriate. I note that, in preparing the proposed plan, the council has consulted the education and roads authorities and other services providers, and that none have objected in principle to the main expansion proposals for the town because of increased stress on services and infrastructure (including on the basis of the cumulative impacts of developments).

6. I acknowledge that St Andrew’s is an attractive town, set in attractive surroundings, and that its role as one of the economic drivers in the regional economy has to be balanced against a need to protect its environmental and cultural heritage qualities. In broad terms, I am satisfied that a balanced and managed approach to the growth of the town can be achieved through the various environmental and cultural heritage designations and the associated suite of policies set out in the proposed plan. This includes the green belt around the town, the green network priorities, the conservation areas and the listed buildings. Concerns were expressed about significant breaches of the green belt since it was established in 2012 and the threats to public and protected open space. Where appropriate, these are considered further below in relation to specific allocations and sites.

7. Reference was made in representations to the future of the playing fields at Station Park. The proposed plan designates this area as protected open space. As the playing fields are an outdoor sports facility and they form a pleasing, prominent feature at one of the main entry points into St Andrews, I consider this to be an appropriate designation. It would be beyond the scope of the proposed plan to set out measures for the management and maintenance of an existing area of open space. The proposed plan goes as far as it can by indicating in Policy 13: Natural Environment and Access that it supports development proposals where they protect or enhance natural access assets, such as greenspaces.

8. One representation proposes removing from the green belt an area to the south west of Craigtoun Country Park between Denhead and Feddinch. This part of the green belt boundary is the same in both the adopted local plan and the proposed plan. The 2003 report on the “Landscape Capacity Assessment and Proposed Green Belt Study of St Andrews” by Alison Grant indicates that the area concerned is part of a larger area that is of high scenic quality and an important component of the landscape setting providing a wooded backdrop to the south west of St Andrews, and that its boundary is located to
maintain the integrity of the Hills and Dens landscape character which contributes most significantly to the settlement's setting. I agree with this assessment. Furthermore, I do not accept the justification put forward for changing the boundary. The existing green belt boundary is satisfactorily defined, in the main, by a narrow road. I am not persuaded that a boundary following farm tracks and tree belts offers a better definition for the green belt. Scottish Planning Policy explains that development associated with agriculture, woodland and forestry, and horticulture would be appropriate within a green belt. No good reason has been given why these provisions would not allow for the appropriate future management of existing business assets at this location. In this sensitive area, proposals for other development categories are better judged against green belt policy rather than general countryside policy. In the circumstances, I consider that the green belt boundary should be retained in the position shown in the proposed plan.

9. Concern was expressed about the complex process for lodging representations online, and the council may wish to consider if this system can be improved. However, I note that the representation in this instance was submitted and considered, and that representations can be lodged by other means, including letters and e-mails. Furthermore, it has been concluded that the measures taken by the council to engage the community in the proposed plan, when considered together, were satisfactory. (See Issue 1). While concern was also expressed about the council’s reliance on members of the public to inform them of issues with listed buildings and to monitor conditions on development sites, these matters fall outwith the scope of this examination.

10. Overall, no adjustments are required to the proposed plan as a result of the representations considered under this heading.

STA 001: St Andrews West

11. STA 001 is a large site, extending to 116 hectares, which is proposed for a mix of uses, and is located on the north western, western and south western edges of St Andrews. In the main, the site comprises fields, and adjoins university buildings and housing. Its allocation as a strategic development area is a continuation of its allocation as a strategic development area in the adopted local plan. The estimated capacity of the housing areas is 1090 houses, which are to be developed on a phased basis. While there is no doubt that this is a large development which will inevitably have significant impacts, I do not consider that this is an unacceptable scale of development for a settlement of this size, subject to the rate of expansion of the town being properly managed, including appropriate mitigation of the impacts. The allocation is expected to contribute to the housing land requirement.

12. In addition to housing, the strategic development allocation is to include: a one hectare site for energy generation for Combined Heat and Power/renewables technology, local retail opportunities, community facilities, a primary school, a 5 hectare business park (Class 4), a 10 hectare research and development or science park related enterprise, 8 hectares of business land (Classes 4, 5 and 6), and a road link. The allocation is to be masterplanned.

13. I do not consider that there is any reasonable basis for deleting the strategic development allocation from the proposed plan. The allocation is required by TAYplan, which highlights that strategic development areas such as the one here will make a major contribution to the housing offer and competitiveness of the region with
employment land integrated. TAYplan also highlights the role of the higher education sector in growing the commercial value of research. I accept that the northern part of the allocation would achieve synergy between the university-related development and the housing. The latter is an important enabler of the former and, to this end, the proposed plan states that housing north of Strathkinness Low Road will support the planned expansion of the university over the next 20 years. The allocation was considered at the examination into the adopted local plan in 2011-12, and I do not consider that there has been any significant change in circumstances since that time. I acknowledge that the sites are greenfield, but there is an absence of sufficient and appropriate brownfield sites, and of sites within settlements. In these circumstances, I consider that sites adjacent to and well related to settlements, such as this allocation, are acceptable.

14. Based on my site inspections around St Andrews and the evidence before me, I consider the area of the allocation to be a less sensitive landscape than other areas to the south west and south of St Andrews. There is no doubt in my mind that development here would have an impact on the landscape setting of the town, but the report on the previous examination concluded that it would not be significantly detrimental. I agree with this conclusion, and believe that, through an appropriate masterplanned approach, views towards the historic skyline could be preserved. I note that the allocation is valued locally for its wildlife and environmental interest. However, Scottish Natural Heritage has not objected to it on these grounds, and no nature conservation issues have been drawn to my attention which would undermine the allocation. Furthermore, such matters would be likely to be subject to more detailed assessment as the development proposals and masterplanning exercise move forward. The proposed plan provides an appropriate context for this by highlighting a need to establish new high quality greenspace as an integral part of the wider green network, combined with habitat provision, and by retaining and protecting from encroachment the pond at North Haugh.

15. Concerns were expressed about the “transport link” from the A91. The proposed plan indicates that a road link is required between the A91 and Craigtoun Road to minimise the impact of development on the town centre and improve travel around town. In principle, I accept that an additional route such as this should help in distributing traffic through the town and reducing impacts on the town centre. I am also satisfied that the interception of traffic off the A91 and the ability of existing roads to cope are detailed matters which could reasonably be addressed at a later stage when a traffic assessment and the design of the route are being prepared. While I agree that discussions with NHS Scotland on possible impact on healthcare service could be beneficial, they do not require to be mentioned in the proposed plan. Concern was also expressed about possible flooding, but I note that the proposed plan requires a flood risk assessment to be prepared to inform the masterplan, and that the Scottish Environment Protection Agency support this approach.

16. The adopted local plan states that the masterplan process will involve community engagement on all aspects of the proposals, and will ultimately form part of a planning application. This has not been continued through into the proposed plan. I believe that community consultation is an important part of the masterplanning process, and that an explicit reference should be added to the development requirements for this allocation.

17. A number of representations were directed at the Craigtoun part of the allocation, which is the southernmost part lying between Melville Road and Craigtoun Road. The
area designated for development at Craigtoun in the proposed plan and strategic
development area framework diagram has increased in size from that shown in the
adopted local plan. I also note that the larger area is now the subject of a planning
application for planning permission in principle for a mixed use development, including
residential, commercial, business, retail, hotel, and community uses.

18. The strategic framework diagram sets a broad context for the overall development
of St Andrews West. However, large scale strategic allocations such as this are
complex, take time to bring forward, and evolve as more detailed proposals are prepared
and circumstances change. It is important that in bringing forward one part of an
allocation does not jeopardise the delivery of the balance. In this respect a single
masterplan for the whole allocation would be helpful, but is not essential because of the
preparation of the framework diagram. A single masterplan also relies on a lot of co-
operation between the parties involved, and it is not clear to me that this would be
forthcoming. Given the uncertainty associated with such allocations, I consider that a
flexible approach is the most appropriate. To this end, the proposed plan helps by
reasonably indicating that the uses shown on the diagram are indicative and may
change, and that the housing numbers are approximate.

19. While one representation seeks to constrain the scale of the housing development
at Craigtoun, I am not satisfied that it has been demonstrated that a flexible approach
should be set aside, and that a development limit of 150 houses should be applied with a
limited annual pro rata build rate. I am also not persuaded that the wording in the
proposed plan on developer contributions for the allocation should be changed from
contributing “on an equitable basis to the essential community infrastructure” to
contributing “on an equitable basis to all infrastructure.” It seems to me that the current
wording in the proposed plan on developer contributions for the allocation is more in line
with the thrust of Policy 4: Panning Obligations (as modified by the recommendations of
this report) and Circular 3/2012 Planning Obligations and Good Neighbour Agreements
both of which set out the basis on which contributions should be required. I
acknowledge the importance of ensuring that the university related part of the
development is delivered, and I note that progress now appears to be being made on
this part of the allocation as, in a response to FIR 84, the developer for this proposal
indicates that the parties involved are moving forward with their proposals and will
shortly submit a Proposal of Application Notice. However, I consider that the flexibility
that Craigtoun provides in the delivery of the allocation, and the contribution that it
potentially makes towards the housing land requirement should not be underestimated.
This reinforces my view that the changes proposed to the plan should not be made.

20. The council explains in its response to FIR 84 that the increase in the developable
area at Craigtoun is primarily because of the identification of a new employment
allocation. It appears that this new allocation represents a redistribution of the 8
hectares of employment land which is proposed for the strategic development area as a
whole, with 2 hectares now being at Craigtoun and 6 hectares remaining in the northern
part of the allocation. The rejection of a proposed employment site at the previous
examination related to a larger proposal on a different site to the south east of Craigtoun
Road, and not to the current proposal. The Fife Employment Land Strategy 2014-2021
shows a shortage of marketable employment land in St Andrews. The additional 8
hectares of employment land proposed here would make an important contribution to the
marketable supply. I consider that the allocation of 2 hectares of that employment land
at Craigtoun to be reasonable in principle because it would add to the choice of locations
and sites available in St Andrews and the strategic development area. I am not
persuaded that the proposal to reduce the size of the employment site at Craigtoun from 2 to 1.2 hectares, because this reflects the proportion of the strategic development area controlled by the developer, has been properly justified.

21. The extension of this part of the allocation would take the development area to the 45 metre contour, but I do not consider that this would be likely to result in unduly prominent development or that it would be unacceptable in terms of its effect on the landscape setting of the town. I note that it stops short of the more steeply sloping area towards the south. I acknowledge that there would be a reduction in the amount of protected open space in the Craigtoun allocation from that shown in the adopted local plan, but I do not believe this to be unacceptable because sufficient would remain to allow a reasonable landscape framework to be provided.

22. The proposed plan does not show a specific location for the employment land within the Craigtoun part of the allocation. Existing and proposed housing would be in the vicinity of this employment site, but the site would not be large, and I am satisfied that it should be possible to find a location within the allocation where employment uses could satisfactorily co-exist with the proposed and existing housing without unacceptable effects, including from associated traffic using Craigtoun Road. I note that the range of uses allowed on site in the proposed plan could potentially include class 4 (business) uses, which would be compatible with a residential area. While it could also include classes 5 (general industrial) and 6 (storage and distribution), the impact of uses such as these on existing and proposed housing would be taken into account as a material consideration at the development management stage. Satisfactory co-existence between residential and employment uses would inevitably be taken into account in the preparation of a masterplan, and I am not convinced that very much would be gained by highlighting in the development requirements for the allocation, a need to have regard to residential amenity and appropriate land use distribution.

23. Other detailed additions proposed to the development requirements, including a reference to a restaurant/pub use, confirmation that the floorspace for each local retail opportunity is gross, and an indication that the primary school would meet capacity needs within the next 20 years, would contribute little, but detail, to the proposed plan. As such, I consider these changes unnecessary. While no good explanation has been given of why the extension of the Craigtoun development area is required to deliver an access to Craigtoun Road, I agree with the council that an additional, alternative access such as this would be likely to improve traffic circulation within the development. Drawing these matters together, I am satisfied that the extension of the development area within the Craigtoun allocation and the requirement for 2 hectares of employment land are reasonable and should remain in the plan.

24. Overall, an adjustment is required to the proposed plan, as set out below.

Non-inclusion of sites: LDP-STA001 Craigtoun

25. The development of this 13 hectare site for housing would extend St Andrews further westwards between Strathkinness Low Road and Craigtoun Road as far as Lovers’ Lane. The site comprises agricultural fields. It lies outwith the settlement boundary, and its designation as both green belt and local landscape area in the proposed plan is a continuation of its green belt and local landscape area designation in the adopted local plan.
26. The site is roughly triangular in shape, and slopes up towards the south. Beyond its southern boundary, which constitutes the 50 metre contour, the site slopes up more steeply. I acknowledge that there would be a “large extent” of green belt remaining to the south and west of the site if the site was allocated for development. However, at present, the site itself is greenfield, forms part of an attractive area of countryside which is of local landscape value, and materially contributes to the landscape setting of this part of St Andrews. When these factors are combined with the fact that the site helps to clearly separate town and country, I consider that it can be regarded as an integral part of the green belt. I can therefore see no compelling landscape reason for taking this site out of the green belt. I would also be concerned because it is only relatively recently that the green belt boundary has been established. While I accept that the allocation of the site for development would be a westwards extension of the St Andrews West Strategic Development Area allocation at Craigtoun, no development has started on any part of the strategic allocation as yet, and the site was rejected at the previous examination. If an extension of the allocation is required in the future, this site could potentially be considered, but it would need to be supported by a fully detailed up to date landscape assessment. No doubt, it would also be evaluated against other options which may emerge at the time, and which may be shown to be more suitable in landscape and other terms.

27. A local retail hub and community facilities are proposed in the Craigtoun strategic allocation to the east, and a layout could be devised which would make them reasonably accessible from the site both on foot and by bicycle. The town centre is not so accessible from this part of St Andrews by foot and bicycle and, as the site would further elongate the settlement, the town centre would be even less accessible from it. It would likely be more accessible by public transport, particularly once the Craigtoun allocation has been built out. No one has disputed that appropriate vehicular access points could be formed to serve the site.

28. I acknowledge that there is a shortfall in meeting the housing land requirement in the SESplan area of Fife together with the uncertainties expressed with regard to the level of that shortfall under Issue 2(b) Homes. However, the conclusions find that adequate housing land has been provided in the TAYplan area in line with requirements set out in the strategic development plan. In addition the 2015 Housing Land Audit has found that there is a 5 year effective housing land supply in both the Cupar and North West Fife and St Andrews and North East Fife Housing Market Areas. Accordingly, there is no strategic numerical justification to allocate further sites for housing within the TAYplan area. Additionally, I am concerned that this 13 hectare site could potentially accommodate many more houses than the 150 houses estimated in the representation. I am also concerned that allowing such a large extension to the 17 hectare strategic allocation to the east could jeopardise the delivery of the northern part of the St Andrews West Strategic Development Area allocation, including the important university related development, which is supported by TAYplan. Furthermore, I do not consider that this site should be considered as a long term development opportunity to extend the strategic development area at this stage. There is no appropriate policy context for such an approach, and it would pre-empt a proper assessment of options should a need to extend the strategic allocation be identified in the future.

29. Overall, no adjustment is required to the proposed plan.
STA 002: Grange Road

30. STA 002 is situated towards the south eastern edge of St Andrews, on the western side of Grange Road, to the south of its junction with Irvine Crescent. It comprises a field, which adjoins a housing area to the north, and along the northern most part of its western boundary. It extends to just over 2 hectares. Its allocation for housing in the proposed plan is a continuation of its housing allocation in the adopted local plan. The estimated capacity of the site is 50 houses. The site contributes to meeting the housing land requirement, and is a part of the settlement strategy.

31. The development requirements in the proposed plan for this allocation indicate that the site is intended for university related housing development. I agree with the council that the site could provide for university related development in the short term because, on the face of it, it appears a more straightforward proposition to develop than the large scale and complex St Andrews West Strategic Development Area proposal. The proposed plan is clear that tied staff housing is not exempt from contributions towards planning obligations, with the exception of affordable housing. One representation seeks additional wording in the development requirements to allow the university to partner other development interests to deliver the development. The council accepts this change to the proposed plan, subject to any tied staff housing making financial contributions towards affordable housing if it becomes mainstream housing. I am satisfied that this change would provide more opportunity to deliver the development in the short term. I consider it only reasonable for the council to be able to seek a financial contribution if the tied staff housing subsequently becomes mainstream housing. If this was not the approach, these houses would be able to avoid making any contribution towards affordable housing unlike other new mainstream housing.

32. While the site is greenfield, it is within the settlement boundary in both the proposed plan and the adopted local plan. Planning permission in principle was granted on appeal for a residential development on site in 2010, but it was never implemented. I do not consider that this much smaller site sets a precedent for the allocation of STA 013 Pipeland Farm which lies further to the west of this site, and which I deal with below. The site has been identified as providing a visual link between the coast and the hills, and as contributing to the settlement edge, with a small area to the north west having some potential for development. I accept that the balance of the site forms part of a much larger area which has steep, rising, and highly visible slopes, which contribute to the wider setting of the town. These slopes provide an attractive rural backdrop to the town. However, I note that the site is limited in extent, and believe it to be well screened by the land form, tree cover (including at The Grange), and existing development. While the site rises southwards, it is not so prominent, and I am satisfied that development here would not represent an unacceptable incursion on to the slope beyond the existing built up area. The site’s role as a visual link between coast and hills should not be overstated. In light of these factors, I do not consider that the site contributes significantly to the landscape setting of St Andrews. I also consider that the proposed university related housing allocation would be compatible with the residential character of the adjoining area. In the circumstances, I am satisfied that the allocation should remain in the proposed plan.

33. The site would be accessible from Grange Road, and the need for any restrictions on access points, including on the western boundary, could reasonably be considered at the planning application stage. While concerns were also expressed about a gas pipeline, flooding and drainage, I note that neither the Health and Safety Executive nor
the Scottish Environment Protection Agency objected to the allocation. Indeed, the Scottish Environment Protection Agency supported the development requirements in the proposed plan for a flood risk assessment and the provision of a sustainable drainage system. The gas pipeline can be investigated further when detailed proposals are being drawn up. These constraints are not sufficient to prevent the allocation of the site for housing.

34. Overall, an adjustment is required to the proposed plan, as set out below.

STA 003: New Park School

35. STA 003 is situated in the western part of St Andrews, on the southern side of Hepburn Gardens, opposite its junction with Middleshade Road. It extends to 1.5 hectares. Its allocation for housing in the proposed plan is a change from its allocation as an area of mixed use in the adopted local plan, with preferred uses being housing and employment. The capacity of the site is 21 houses, for which planning permission has been granted. The site contributes to meeting the housing land requirement, and is a part of the settlement strategy. Construction of the housing is currently underway on site.

36. The additional development requirements for the site in the proposed plan indicate that the proposal should include ancillary use class 4 (business). It is pointed out in a representation, and the council confirms, that a financial contribution towards off site employment provision was accepted instead of on site use class 4. In order that the proposed plan accurately reflects the up to date position, I agree that the reference to use class 4 should be deleted from the additional development requirements.

37. I consider that the green network priority identified for the site of “develop a new high quality landscape edge with the green network” is sufficiently clear. The Proposals Map/Inset Map for St Andrews shows Lade Braes Walk and Kinness Burn adjacent to the south east and east of the site, and they are designated as protected open space and a part of the green network. The priority seeks to protect the open space from the effects of the development, and to enhance it, if possible. I agree with the council that this additional development requirement remains relevant and should be retained in the proposed plan because a proposal may come forward which seeks to change the existing planning permission.

38. Overall, an adjustment is required to the proposed plan, as set out below.

STA 004: Madras College, Kilrymont and STA005: Madras College, South Street

39. I deal with the representations for these 2 allocations under STA 013 Pipeland Farm below.

STA 006: St Leonards

40. STA 006 is situated to the south east of the town centre between Abbey Walk, Greenside Place and Kinness Burn. It extends to just over 5 hectares. Its allocation for housing/hotel in the proposed plan is a change from its allocation as part of a larger area of mixed use in the adopted local plan, albeit that housing/hotel were both possible uses under this earlier allocation. The estimated capacity of the site is 241 houses. The council clarifies that this figure refers to the total number of houses that would be built on
the site identified on the Inset Map for St Andrews. In response to FIR 85, the council and Robertson Homes Ltd give slightly different figures for this total from that shown in the proposed plan. However, as they are of a similar order (within 5% of each other), I consider that it would be reasonable to retain the figure that has been used in the plan.

41. The estimated housing capacity assumes that part of the site (Abbey Park House) would be developed as a hotel. Concern has been expressed about this requirement. If this was to be deleted, the estimated capacity of the site could be increased to 280 houses, which would allow for a variety of housing tenures and types of residence. The developer’s ambition for the hotel site is now clearly residential development.

42. Efforts have been made to market it for hotel development on 3 occasions (2011, 2013, and 2015). While only one party expressed a firm interest in this opportunity (in 2015), I note that general economic conditions were relatively flat during these periods, potentially making it more difficult to secure an operator. The developer has reservations about achieving an appropriate hotel development on this sensitive site, and points out that the 2015 target for new hotel bedrooms in St Andrews, as identified in the 2012 Scottish Enterprise Commissioned Report “Future Supply and Demand Modelling – St Andrews” has been exceeded. However, the modelling results in the report are strongly caveated, and are only an indicator of the level of accommodation that may be required. I therefore believe that the report should be treated with some caution.

43. There is no doubt that St Andrews is an international and national tourist destination, and that it is renowned as the world’s home of golf, and recognised as a historical and cultural centre, and as a coastal resort. The 2012 Fife Council commissioned report “Hotel Development Study – Fife” found that St Andrews had issues of seasonality, a lack of branded hotels (compared to similar destinations, for example, Stirling and Windsor), and a perceived shortage of affordable accommodation. This indicates to me that there is scope for further hotel development in St Andrews, which the council clearly wishes to encourage, as shown by the choice of sites considered suitable in the proposed plan for such development. I accept that this site may have at least some weaknesses, such as the lack of an obvious street frontage, but it also has positive characteristics, including being of a reasonable size, and well located on the edge of the town centre, and very close to the historic core and beach.

44. The council commissioned report reviewed this site, along with others, against several criteria (access, visibility, current use, topography, surrounding environment, and site availability), and it concluded amongst other things, that it was likely to be an attractive prospect for a hotel developer, that it was in an attractive location, and that it was one of 4 opportunities offering the highest potential for economy level hotel development. The council indicates that pre-application discussions are currently ongoing with a developer who intends to develop a hotel at the site. While I accept that an appropriate standard of design is required, which reflects the location, it has not been demonstrated that this cannot be achieved. I must also bear in mind the vision and objective of TAYplan to promote and enhance places and landscapes as tourist destinations. More specifically, in relation to St Andrews, TAYplan indicates that the emphasis will be to build on the continued economic potential of its international reputation as the home of golf and a tourist destination. Drawing these matters together, I conclude that there remains a reasonable prospect of securing a hotel development on the Abbey Park site, and that the allocation should be retained in the plan.
45. Overall, no adjustment is required to the proposed plan.

**STA007: St Leonards Lodge**

46. STA 007 is situated to the south east of the town centre between Abbey Walk and STA 006 St Leonards. It extends to 0.2 hectares. Its allocation for employment in the proposed plan is consistent with its allocation as part of a much larger area of mixed use in the adopted local plan, because an employment use (class 4 office development of 1000 square metres) was required under this earlier allocation. In response to FIR 86, the council indicates that a class 4 business development is under construction on the site.

47. Clarity is sought on whether the council used contributions from 2 other developments in St Andrews to acquire this site, and what positive steps the council is taking with developer contributions to deliver employment land in St Andrews. Developer contributions relating to the provision of employment land are covered in the sections of the proposed plan dealing with planning obligations and employment land and property, and under Issues 2a and 2d of this report. It is up to the council to ensure that any developer contributions raised are used appropriately and in line with national guidance. I do not believe that the detailed matters raised in the representation require to be addressed by the proposed plan. Such matters could readily be pursued with the council outwith the examination process.

48. Overall, no adjustment is required to the proposed plan.

**STA 008: Strathclyde**

49. STA 008 is situated on the northern edge of St Andrews, on the western side of the A91 (Guardbridge Road), to the north of North Haugh, and opposite playing fields and golf courses. It comprises fields, which are close to university facilities to the south. It extends to just over 7 hectares. Its allocation for employment/hotel in the proposed plan is a continuation of its employment/hotel allocation in the adopted local plan, which also indicates that it was allocated in the earlier 1996 St Andrews Area Local Plan.

50. Concern is expressed at another hotel being proposed in the town. There is no doubt that St Andrews is an international and national tourist destination, and that it is renowned as the world’s home of golf, and recognised as a historical and cultural centre, and as a coastal resort. The 2012 Fife Council commissioned report “Hotel Development Study – Fife” found that St Andrews had issues of seasonality, a lack of branded hotels (compared to similar destinations, for example, Stirling and Windsor), and a perceived shortage of affordable accommodation. This indicates to me that there is scope for further hotel development in St Andrews, which the council clearly wishes to encourage, as shown by the choice of sites considered suitable in the proposed plan for such development. The site has positive characteristics, in particular, its location on one of the main entry points into St Andrews.

51. The council commissioned report reviewed this site, along with others, against several criteria (access, visibility, current use, topography, surrounding environment, and site availability), and it concluded amongst other things, that it was likely to be an attractive prospect for a hotel developer, that it was in an attractive location, and that it was one of 4 opportunities offering the highest potential for economy level hotel development. I see no reason why an appropriate standard of design cannot be
achieved particularly as the proposed plan requires a high standard of design for this prominent site, which is also to contain research and development, and high technology development, linked to the university. I must also bear in mind the vision and objective of TAYplan to promote and enhance places and landscapes as tourist destinations. More specifically, in relation to St Andrews, TAYplan indicates that the emphasis will be to build on the continued economic potential of its international reputation as the home of golf and a tourist destination. Drawing these matters together, I consider that the inclusion of an allocation for a hotel on this site is appropriate.

52. Overall, no adjustment is required to the proposed plan.

STA 010: Hepburn Gardens

53. Hepburn Gardens Conservation Area is to the west of the town centre, stretching from the junction of Doubledykes Road, Argyle Street and Hepburn Gardens to a point on Hepburn Gardens by Lawhead Primary School. The plan proposes (in the settlement plans section) extensions of the conservation area to include (1) the properties (and private gardens) on the western side of Middleshade Road (2-18 Middleshade Road and 69 Hepburn Gardens), (2) the whole of Cockshaugh Park, and (3) the area westward along Buchanan Gardens as far as Lawhead Road.

54. There is no dispute about the principle of extending the conservation area. However, the Inset Map for St Andrews shows only areas (1) and (2) as being extensions, and it omits area (3). Understandably, this has caused local concern. Area (3) broadly reflects the character and appearance of the conservation area and, as such, would be a natural extension of it. I agree with the draft Hepburn Gardens Conservation Area Appraisal and Management Plan that its inclusion within the conservation area would help protect architectural details and original features from unsympathetic alterations. A plan (appendix 4) showing the boundaries of the 3 proposed extensions is provided in the draft appraisal and management plan.

55. In response to FIR 87, the council indicated, in effect, that the North East Fife Area Committee had agreed the 3 extensions to the conservation area on 27 April 2016, and that the omission of area (3) from the Inset Map was a drafting error. While the map agreed by committee and attached to the FIR response, showed adjustments had been made to the boundaries of area (3), by removing garden ground associated with 23 Lawhead Road East and extending the boundary to the north side of the carriageway along Buchanan Gardens, these are minor changes which give rise to no significant issues. To avoid any confusion over the correct boundaries of the conservation area, I consider that the Inset Map for St Andrews should be changed to show area (3) as agreed by the area committee. I consider it unnecessary to alter the descriptions of the extensions in the settlement plans section because the recommended change would make them consistent with the Inset Map, and would therefore remove any confusion. I also note that the existing descriptions of the extensions satisfactorily reflect the descriptions given in the draft conservation area appraisal and management plan.

56. Overall, an adjustment is required to the proposed plan, as set out below.

STA 011: West Sands

57. STA 011 is on West Sands Road to the north of St Andrews, between the beach and golf course. It extends to 0.25 hectares, and comprises a few beach facilities,
including a café and toilets. Its allocation as other proposal in the proposed plan is a change from its allocation as part of a much larger area (37 hectares) of environmental improvements and enhancement of facilities in the adopted local plan.

58. The proposed plan indicates that this allocation is for a replacement visitor and education centre. Based on my site inspection, I have no doubt that the existing facilities on site require modernisation. A planning application for a visitor centre was refused by the council in November 2014, and was dismissed on appeal in February 2015. The appeal decision concluded that the proposed visitor centre was appropriate in this green belt location, but that its design, scale and massing would unacceptably harm visual and landscape amenity. While this is a sensitive area, I believe that an allocation which seeks to provide new, improved facilities for visitors on the site of out of date existing facilities is reasonable. I therefore agree with the council that it would be appropriate to retain this allocation in the proposed plan.

59. In response to a representation, the council proposes that the development requirements for this allocation include an additional requirement to provide high quality sustainable drainage systems. I agree that this is necessary to ensure that the integrity of the nearby Firth of Tay and Eden Estuary Special Protection Area/Special Area of Conservation and designated bathing waters are not adversely affected. This approach provides consistency with the broad objectives underlying the 2003 Environment and Water Services (Scotland) Act, and the Water Framework Directive.

60. Overall, an adjustment is required to the proposed plan, as set out below.

STA 012: Botanic Gardens

61. STA 012 is in the Botanic Gardens, which is off Canongate, to the west of the town centre. It extends to around 0.5 hectares, and comprises, in the main, a working area, which is not open to the public. It also contains a smaller area, including an orchard and kitchen garden, which is open to the public. Its allocation as protected open space and other proposal in the proposed plan is a change from its allocation as protected open space in the adopted local plan.

62. The proposed plan indicates that the site is identified as an opportunity for sensitive, small scale development that cross subsidises the long term sustainable operation of the Botanic Gardens. It continues that development uses must be sympathetic and complementary to the continued role of the wider area as a Botanic Garden. A planning application was recently lodged with the council for the use of a small area (0.07 hectares) of ground as private function and event space. This site adjoins the southern boundary of the allocation site. I cannot see any suggestion in the proposed plan and the evidence before this examination that housing is a preferred or acceptable use on the allocated site, or that it is to be encouraged. If a planning application was to come forward for housing here, I am satisfied that the proposed plan already provides an appropriate policy framework to ensure that it is rigorously assessed. In the circumstances, I consider it unnecessary to change the development requirements for this allocation to address a possible housing use.

63. Overall, no adjustment is required to the proposed plan.
STA 013: Pipeland Farm, STA 004: Madras College, Kilrymont, and STA005: Madras College, South Street

64. STA 013 is situated just beyond the southern edge of St Andrews, to the east of the community hospital, and between Lamberton Place and Jamie Anderson Place, and the houses at Pipeland Farm Steading and Pipeland Farm Cottage. It predominantly comprises fields which slope downwards from the south towards the north and the edge of St Andrews. It extends to just under 13 hectares. Its allocation as a proposed school is a change from its designation as green belt in the adopted local plan.

65. STA 004 is situated between Kilrymont Road and Roundhill Road, close to the southern boundary of St Andrews. STA 005 is situated between South Street, Lade Braes Lane, Lade Braes Walk and Rose Lane, on the southern edge of the town centre. Both sites are occupied by Madras College, a secondary school. Their allocation as development opportunities in the proposed plan is a change from their designation as schools in the adopted local plan, albeit that STA 005 continues to be designated as a school or further education campus in the proposed plan.

66. The council is proposing that Madras College be moved to a new single campus at Pipeland Farm from its current sites at Kilrymont Road and South Street. In September 2013, it submitted an application for a new secondary school and associated facilities, including playing fields and regrading of land, at Pipeland Farm. In May 2014, before the publication of the proposed plan, the council, acting as planning authority, granted planning permission in principle for the proposal, subject to 35 conditions. Subsequently, the council applied in July 2014 for an application for approval required by conditions, and this was approved in December 2014, subject to 10 conditions. In the spatial strategy section of the proposed plan, the council indicates that the new secondary school at Pipeland Farm was an exceptional proposal justified by community needs, and that it does not open the remainder of the green belt to unjustified development.

67. Meanwhile, the grant of planning permission in principle had been challenged in the Outer House of the Court of Session by the St Andrews Environmental Protection Association Limited. Its petition was refused in March 2015. The decision of the Outer House was then appealed to the Inner House of the Court Session, which quashed the planning permission in principle as unlawful in March 2016.

68. The proposed plan, the representations lodged, and the council’s response to them have clearly been overtaken by events. FIR 88, issued at the end of March 2016, gave the council and representors the opportunity to update their submissions, taking account of the decision to quash the planning permission in principle. The council’s response to FIR 88 referred to the site selection process which had led to STA 013 being selected as the preferred option. The council, as planning authority, believes that STA 013 should be retained in the proposed plan, either within or outwith the green belt. It considers that retaining the site outwith the settlement boundary would avoid establishing a principle for other development on the site. The council also believes that the development requirements for the allocation should be changed to indicate that STA 013 is dependent on the outcome of a planning application.

69. I consider that this large site is in a sensitive countryside location on the edge of the built up area, and close to one of the main roads into the town. It rises southwards from the relatively low lying edge of the built up area, and contributes to forming part of a
distinctive green rim around the southern edge of the town, which emphasises the low
lying nature of the town. This area forms an important part of the landscape setting of St
Andrews, providing visual containment. While the community hospital lies to the west of
the site, the school would be a bigger, and more prominent and conspicuous
development. I agree with the 2003 Landscape Capacity for Fife Settlements: St
Andrews Study, which indicates that, with the exception of the north western corner, the
site forms part of a larger area where the steep rising, highly visible slopes are a major
landscape constraint. The previous examination report considered an industrial
proposal (STA 05) on a much smaller part of the site and the reporter concluded that it
would be detrimental to the landscape setting of St Andrews. The reporter also
concluded that a housing proposal on a larger site would be detrimental to the landscape
setting of St Andrews. I believe that these conclusions apply to this large scale
proposal. In these circumstances, I believe that, in this location, the green belt should
revert to the boundaries shown in the 2012 adopted local plan, which would place the
greatest part of the site in the green belt outwith the settlement boundary of St Andrews.

70. There is no doubt that there is a need for improved secondary school facilities in
the area. Such a development would be urban in nature, and I believe that it would be
incompatible with a green belt designation. I therefore do not accept the council’s
suggestion that STA 013 could be reasonably retained in the proposed plan with a green
belt designation.

71. Scottish Planning Policy indicates that appropriate development in the green belt
may include, amongst other things, development meeting an established need if no
other suitable site is available. It is clear that the council considered a number of
alternative sites. However, the opinion provided by the Inner House of the Court of
Session did not accept the council’s approach, as planning authority, to the
consideration of alternative sites. If STA 013 was retained in the proposed plan outwith
the green belt designation, I am concerned that it would unacceptably remove the
requirement to consider other potentially more suitable sites, which could be considered
available. The council highlights that the Environmental Statement concluded that
Pipeland Farm was the only suitable site available, but I am not persuaded that this is
helpful because that assessment informed the approach taken to the consideration of
alternative sites in the planning officer’s report on the application for the planning
permission in principle (the decision on which has been quashed by the court). The
council decided on 10 May 2016 to pursue its application for STA 013 and to undertake
a full assessment of alternative site options, giving due consideration to all sites currently
identified and any others that may come forward. The council, as planning authority,
should carry out its assessment of the alternatives based on the approach outlined at
paragraph 39 of the court opinion. It is not for this examination to carry out such an
exercise.

72. Drawing these matters together, I believe that STA 013 should be deleted from the
proposed plan. While an alternative site for a secondary school at North Haugh was
referred to in some representations, and it was identified in the development framework
in the adopted local plan as an option, it has not been included in the proposed plan and
it has not been satisfactorily justified. There is also no basis for including in the plan
other possibilities referred to in representations. I believe it best if the alternatives are
considered through the exercise the council, as planning authority, will undertake.

73. The release of STA 004 and STA 005 as development opportunities would follow
on from the construction of a new secondary school. Given that the planning permission
in principle for STA 013 is quashed, the resulting uncertainty over the location of the replacement secondary school, the unknown timescales for its development, and the fact that the 2 allocations could be assessed as alternative sites for it, I also believe that STA 004 and STA 005 should be deleted from the proposed plan and revert to their designation in the adopted local plan of school or further education campus. If the allocations had been retained in the proposed plan through this examination, I would have agreed with the council that development frameworks should be prepared and public consultation undertaken. I do not consider that other concerns raised in representations about these allocations would have justified, or made necessary, changes to the development requirements stated in the proposed plan.

74. As a consequence of these changes, changes are also required to the St Andrews Area Strategy in the Spatial Strategy section of the proposed plan. The references to a new secondary school at Pipeland Farm, and the reuse of the existing Madras College sites at South Street and Kilrymont, should be deleted. They should be replaced with a general statement that there is a need for a new secondary school in the St Andrews area to replace the existing Madras College, and that the council, as planning authority, will in its assessment of the alternative locations have proper regard to planning considerations.

75. In coming to my conclusions, I note that concerns have been expressed about the validity of the response from the Royal Burgh of St Andrews Community Council to FIR 88, and declarations of interests. However, such matters fall outwith the scope of this examination, which has to focus on unresolved (planning) issues raised in representations rather than respond to each individual representation.

76. Overall, adjustments are required to the proposed plan, as set out below.

Non-inclusion of sites: East Sands

77. The site covers an area of around 13 hectares lying to the south east of the town centre, and adjacent to the cathedral grounds. It contains many land uses, university properties, private housing and small businesses, and stretches south from the harbour, across Woodburn Place and Albany Park, to the Brownhill cliffs. The adopted local plan shows the site allocated as an area of mixed use.

78. The representations highlight that the East Sands site has been omitted from the proposed plan. While the council indicates that the site was omitted because the approved 2010 Urban Design Framework provides sufficient guidance for development proposals, it now believes that there is merit in reinstating it within the Settlement Plan for St Andrews to highlight that it is a key consideration in the determination of proposals. I agree. I also believe that its inclusion would be appropriate because it allows the proposed plan to recognise the potential benefits to the area of the ongoing improvements taking place. The improvements are likely to continue to take place over a number of years and require a co-ordinated approach. In response to FIR 89, the council suggested wording to be inserted in the Settlement Plan for St Andrews. I accept this wording, subject to a change to take account of the possibility that the Urban Design Framework may be updated or amended. I also consider that any updated or amended version of the framework should be subject to consultation with the community.

79. The design framework indicates that there is a risk of flooding. I therefore consider
It would be prudent to highlight in the proposed plan that flood risk assessments will be required where appropriate.

Overall, adjustments are required to the proposed plan, as set out below.

Non-inclusion of sites: Canongate (former New Park School Playing Fields)

The site is situated in a residential area on the northern side of Canongate and Priory Gardens. It lies within the settlement boundary, and comprises an area of open space. Its designation as protected open space in the proposed plan is a continuation of its protected open space designation in the adopted local plan. A representation promotes its allocation for a housing development of around 30 houses.

Given the residential nature of the surrounding area, I accept that the site could be developed satisfactorily for housing, and I note that in the unpublished 2006 draft local plan, the site was identified for up to 10 houses. I acknowledge that the proposal could facilitate wider public access to the adjacent protected open space to the north, which contains the Lade Braes and woodland. However, there are well worn tracks from Priory Gardens through the former playing fields towards the woodland to the north. The site also appears to be well used informally for recreation, and it contributes significantly to the attractiveness of the area. In the previous examination report, the reporter concluded that the site “does serve a valuable amenity and recreational purpose.” I agree with this conclusion. I also note that the Fife Greenspace Strategy 2011-2016 indicates that St Andrews would benefit from an increase in quantity and access to greenspace. I believe that the proposed plan has a justifiable role in protecting an area of open space such as this. Furthermore, the council indicates that the site did not come forward through the call for candidate sites, and it has therefore not been formally assessed through the local development plan process. I acknowledge that the application for planning permission in principle may mean that an equivalent assessment has now been completed. The public seem to have been aware of the proposal, and there have been several representations seeking the retention of the site as open space and referring to its importance.

I acknowledge that there is a shortfall in meeting the housing land requirement in the SESplan area of Fife together with the uncertainties expressed with regard to the level of that shortfall under Issue 2(b) Homes. However, the conclusions find that adequate housing land has been provided in the TAYplan area in line with requirements set out in the strategic development plan. In addition the 2015 Housing Land Audit has found that there is a 5 year effective housing land supply in both the Cupar and North West Fife and St Andrews and North East Fife Housing Market Areas. Accordingly, there is no strategic numerical justification to allocate further sites for housing within the TAYplan area. Taking this together with my conclusions above, about the value of this open space to the local area, I consider that the site should continue to be designated as protected open space in the proposed plan.

Overall, no adjustment is required to the proposed plan.

STRATHKINNESS

STK 003: Bonfield Road

85. STK 003 is situated in the north western most corner of Strathkinness, between
Bonfield Road and High Road. It comprises an area of scrubland, in part, and extends to just under 4 hectares. Its allocation for housing in the proposed plan is a change from its designation as countryside in the adopted local plan. The estimated capacity of the site is 50 houses. The site contributes to meeting the housing land requirement, and is a part of the settlement strategy.

86. The development requirements in the proposed plan indicate that a phased approach to development will be required to avoid capacity issues at Strathkinness Primary School. As a result of a more recent assessment of primary school capacity, the details of which have not been lodged, it appears that the proposed development could potentially be accommodated without the need for phasing. While further evaluation of this assessment is required, I agree with the council that it would be reasonable for the proposed plan to take a more flexible approach by indicating that a phased approach “may” be required rather than “will” be required.

87. The site slopes southwards, down to Bonfield Road. The site assessment indicates that the site has been the subject of ground works, including excavation of material and dumping of top soil. Development here would extend the village westwards, but not significantly. The western boundary is formed by an intermittent hedgerow and trees, which could be included in a boundary treatment. Development requirements include providing a strong landscape framework along the western boundary, which would be a new settlement edge, and sensitive design and layout to avoid skyline development on the prominent ridgeline. To the east of the site is an area of open space and the allocation of a housing opportunity site for affordable homes (STK 002). While the open space slightly separates the site from the settlement, STK 002 would provide a reasonable visual connection between them. The bulk of the built up area is in the northern part of the settlement, and I am satisfied that a reasonably sized allocation at its north western corner would reflect its form, and would not undermine its identity. Bearing in mind the development requirements for the allocation, I also do not consider that there would be likely to be an unacceptable effect on the landscape setting of Strathkinness.

88. Access to the site would reasonably be taken from High Road, with a pedestrian link to Bonfield Road, and I see no reason why other proposed road improvements could not be satisfactorily accommodated. The roads authority has not objected to the proposals. Local facilities would be reasonably accessible. I note that a planning application was submitted for the development in December 2015, and see no good reason why the site could not be developed in the period up to 2024. Drawing these matters together, I consider the allocation to be satisfactory.

89. Overall, an adjustment is required to the proposed plan, as set out below.

Non-inclusion of sites: Southern edge of Strathkinness

90. The site is at the southern tip of Strathkinness, and is divided into 2 areas either side of the B939. One area on the northern side of the B939 crosses Main Street, the other, to the south, crosses a minor road, which is a continuation of Main Street. The site comprises fields, and both areas together total just under 20 hectares. The site lies outwith the settlement boundary, and its designation as countryside to the west of Main Street and the minor road, and green belt to the east, is a continuation of its countryside and green belt designations in the adopted local plan. A representation promotes the site as a predominantly residential led, mixed use expansion of the village.
91. While it is proposed that phase 1, to the north of the B939, would contain around 65 houses, given the size of this phase (9.6 hectares), it is clear that it could potentially accommodate many more houses. When this is taken together with the size of phase 2 (10.3 hectares), an allocation of the scale proposed would constitute a significant expansion of the village.

92. The southern tip of the village is very narrow, and the bulk of the built up area is to the north. A large scale development at this location would therefore not reflect the village’s existing form and would be very visible. Strathkinness is on a south facing slope above the valley floor, and extensive development further down the slope and at the bottom of the valley would materially detract from its landscape setting and its identity. I do not consider the site to be a natural or logical direction of growth for the village. For these reasons, I am not persuaded that the site should be preferred to the ones that have been allocated in the proposed plan. I also consider that that part of the site on the eastern side of Main Street and the minor road should be retained in the green belt because these features form an appropriate boundary in this area for its outer edge.

93. While I accept that appropriate vehicular access could probably be achieved to the site, given its peripheral location to the south of the village, I do not consider that its connection to local facilities could be regarded as satisfactory. Given the potential scale of the proposal, a further assessment of the educational capacity of the local primary school would be likely to be required. The mixed use element of the proposal does not appear extensive, with the representation indicating that it could be limited to land for potential community hall/facilities and a site for a small farm shop or similar.

94. I acknowledge that there is a shortfall in meeting the housing land requirement in the SESplan area of Fife together with the uncertainties expressed with regard to the level of that shortfall under Issue 2(b) Homes. However, the conclusions find that adequate housing land has been provided in the TAYplan area in line with requirements set out in the strategic development plan. In addition the 2015 Housing Land Audit has found that there is a 5 year effective housing land supply in both the Cupar and North West Fife and St Andrews and North East Fife Housing Market Areas. Accordingly, there is no strategic numerical justification to allocate further sites for housing within the TAYplan area. Taking this together with my concerns about a residential led development on this site, I consider that the site should continue to be designated as countryside and green belt as set out in the proposed plan.

95. Overall, no adjustment is required to the proposed plan.

COUNTRYSIDE AREA

LWD 021: Craigtoun Country Park

96. Craigtoun Country Park lies to the south west of St Andrews in the green belt. A number of water courses flow through the allocation. Planning authorities have a duty to protect and improve Scotland’s water environment under the 2003 Water Environment and Water Services (Scotland) Act. This is continued through into Scottish Planning Policy which, amongst other things, indicates that the planning system should promote protection and improvement of the water environment. In the circumstances, I agree that it is appropriate to add to the development requirements for this allocation, a requirement for buffer strips alongside the watercourses on the site.
97. Overall, an adjustment is required to the proposed plan, as set out below.

Non-inclusion of site: LDP-LWD010 Kinaldy Meadows

98. The site is situated in countryside, some 6 kilometres south of St Andrews, adjacent to a very low density loose grouping of 5 houses, and at the south western corner of a junction between minor roads leading to Stravithie on the B9131 to the east, the A915 to the west, and St Andrews to the north. It extends to just under 10.5 hectares, and comprises a modern industrial style building, which has been used as an equestrian centre, areas of hardstanding, fields, and woodland. Its designation as countryside in the proposed plan is a continuation of its countryside designation in the adopted local plan. No estimated capacity of the number of houses that could be accommodated on site has been provided, but clearly it could potentially be a significant number.

99. The equestrian centre and 5 houses were granted outline planning permission in 1995 and approval of reserved matters in 1998, and were built in 1998-99. The permission also included 6 chalets (holiday homes) and a manager’s house, which have not been built. A section 50 agreement was entered into, and concerned the occupation of the manager’s house, the timing of the different elements of the development, and the requirements for each residential unit (an adjoining paddock with stables or loose box), but its term have now lapsed. In 2010, a planning application was lodged for the change of use and demolition of the equestrian centre and the erection of 5 dwellings and landscaping. It appears that the application concerned a 1.9 hectare site within the larger site for which a housing allocation is now sought. During the council’s processing of the application, it was amended to provide a courtyard development on 0.4 hectares, with the balance of the site being landscaped. The application was refused in 2011, against the recommendation of officers, and was dismissed on appeal in 2012. In the appeal submissions, it was claimed that as the planning permission had been partially implemented, the manager’s house and holiday chalets could still be built. However, the appeal decision concludes that no such intention is clearly stated. It also indicates that no evidence of approval of reserved matters for these elements has been produced. There remains no clear statement of intent, or evidence of such approvals, at this examination.

100. The site is not covered by a landscape designation. While there are houses in the vicinity of the site, the general character of the area as a whole is one of attractive countryside with little development. I believe that without the allocation there is a reasonable prospect that it will remain that way. I accept that the area available for development is likely to be constrained by the woodland and wetland habitat on site and that it would be screened, but a reasonably sized housing development could still be built, and it would be in stark contrast to its rural surroundings. I can see little advantage to be gained from allocating a housing site in this countryside location. The area is accessible countryside, and there could be pressure for further housing development in the area, leading to suburbanisation of the countryside. I find it difficult to regard the very low density loose grouping of existing houses as being a clearly defined cluster and, even if it is, development would not be within a gap in the cluster, but would be on the edge and outwith it, and would constitute a significant extension. I accept that there is a building on a small part of the site. However, it is not out of place, it serves an equestrian (countryside related) function, and it appears well built and in good repair. No part of the site appears derelict at present. Development here would be contrary to the spatial strategy of TAYplan and the proposed plan, which both focus such allocations on sites within and adjacent to settlements. On the same basis, it would also be
contrary to the policy principles underpinning Scottish Planning Policy.

101. The site is isolated, with facilities and services being some distance away in settlements, most notably St Andrews. Any houses built here would be dependent on the private car to gain access to them. They would not be accessible on foot, and public transport links are poor. Furthermore, vehicular access would be taken (via the existing shared access) on to a road with a 60 miles per hour speed limit, and the additional traffic manoeuvring could adversely affect traffic safety, albeit that I acknowledge that it is a quiet, minor road. I am not satisfied that a housing development in this location would support the sustainable patterns of transport, travel and integration which underpin the spatial strategy of TAYplan and the proposed plan.

102. I acknowledge that there is a shortfall in meeting the housing land requirement in the SESplan area of Fife together with the uncertainties expressed with regard to the level of that shortfall under Issue 2(b) Homes. However, the conclusions find that adequate housing land has been provided in the TAYplan area in line with requirements set out in the strategic development plan. In addition the 2015 Housing Land Audit has found that there is a 5 year effective housing land supply in both the St Andrews and North East Fife and Cupar and North West Fife Housing Market Areas. Accordingly, there is no strategic numerical justification to allocate further sites for housing within the TAYplan area. Taking this together with my concerns about allocating this rural site for housing, contrary to the spatial strategy of both TAYplan and the proposed plan, and the policy principles of Scottish Planning Policy, I consider that the site should continue to be designated as countryside in the proposed plan.

103. Overall, no adjustment is required to the proposed plan.

Non-inclusion of site: Northbank Farm, Cameron

104. The site is situated to the south of St Andrews, on the northern and western sides of the A915, and to the south east of Cameron Reservoir, which is a special protection area, a Ramsar site, and a site of special scientific interest. It extends to 9.4 hectares, and comprises a farm steading, agricultural land, and woodland. There is a row of 4 cottages on the southern boundary, facing the A915. Its designation as countryside in the proposed plan is a change from its allocation as an area of mixed use in the adopted local plan (albeit that it is not annotated on the proposals map). Planning permission in principle for a commercial leisure development, including retail, exhibition, café/restaurant, visitor centre, craft workshops, 15 dwellinghouses, 20 holiday units, access road, drainage, infrastructure and demolition of existing buildings was granted in 2010, and this was extended for a further 2 years in 2012. An application for approval required by conditions was granted in 2016.

105. The council indicates in its response to the representation that the proposal was not included in the proposed plan because it did not accord with its strategy, and because it would prevent potential inappropriate development in the countryside. However, the principle of development on this site has now been established and agreed by the council, and the failure to allocate it in the proposed plan conflicts with the decisions the council has taken on the applications for the proposals. I can also find no proper explanation on why the council had thought that it was appropriate to include more or less the same proposals as an allocation in the adopted local plan, and what factors prompted its change of mind.
106. In its response to FIR 90, the council indicates that no site assessment has been undertaken, because the site has not been treated as a candidate site, and that Scottish Natural Heritage had not provided advice through the local development plan process. I do not regard these factors as insurmountable obstacles in this case. I note that full consultation has been undertaken as a part of the submission and processing of the various applications submitted. While Scottish Natural Heritage did not comment on the application for approval required by conditions, it had previously commented on the application for planning permission in principle, and it has responded to FIR 90.

107. Scottish Natural Heritage indicates that the Cameron Reservoir Special Protection Area appears to be used by pink footed geese. The proposals would have a likely significant effect, which could undermine the area’s conservation objectives, because of the displacement of geese. Nonetheless, as there is further supporting habitat available, Scottish Natural Heritage advise that the proposals would have no adverse effect on the integrity of the special protection area. I have no reason not to accept this conclusion. Scottish Natural Heritage provided similar advice on the application for planning permission in principle, subject to a condition being imposed that the visitor management and footpath network plans be implemented in full. Scottish Natural Heritage also highlights that the visitor management plan should have been reviewed 3 years after its publication, and that this does not appear to have happened. It would welcome the opportunity to have an input into an update. This is a matter between the council and Scottish Natural Heritage, and falls outside the scope of the examination.

108. Drawing these matters together, I am satisfied that it is clear that the site benefits from an appropriate planning permission in principle and approval required by conditions and, based on the response from Scottish Natural Heritage to FIR 90, and the response and associated documentation from the council to the same FIR, that there is no sound natural heritage reasons for not including the proposals in the plan. I therefore consider that the site should be allocated for development on the terms outlined by the council in its response to FIR 90. The site would contribute 15 houses towards the housing land requirement.

109. Overall, an adjustment is required to the proposed plan, as set out below.

**Reporter’s recommendations:**

I recommend that the following modifications be made:

1. In reference STA 001 (St Andrews West), page 165, adjust the first sentence of the second bullet point of the second paragraph of the additional development requirements so that it reads:

   “Masterplanning and arrangements for consultation with the community on the masterplan to be prepared by developers for Fife Council’s approval. The masterplan is to define the limits and phasing of development…”

2. In reference STA 002 (Grange Road), page 166, add a new paragraph after the third paragraph of the additional development requirements to read:

   “Partnering opportunities for the delivery of tied University housing on the site can be considered through subsequent planning applications, provided the general
principles of the site allocation are adhered to and the dominant use remains University related. As with the student residential use, suitable legal agreements will be required to prevent conversion of tied University housing to mainstream residential use. Proposed staff (tied) housing would also be subject of a legal agreement to make financial contributions towards affordable housing if it subsequently becomes mainstream housing."

3. In reference STA 003 (New Park School), page 166, delete the second sentence of the additional requirements, which states "The proposal includes ancillary Use Class 4 (business)."

4. In the Inset Map for St Andrews, adjust the boundary of the proposed extensions to Hepburn Gardens Conservation Area by including the area described in the settlement plan for St Andrews as "the area westward along Buchanan Gardens as far as Lawhead Road" as shown in the map in appendix A attached to the council’s response to FIR 87.

5. In reference STA 011 (West Sands), page 168, add a new sentence at the end of the additional development requirements to read:

   "High quality SUDS provision is required on this site."

6. Delete reference STA 004 (Madras College, Kilrymont), page 166, from the plan.

7. In the Inset Map for St Andrews, delete Proposal STA 004 (Madras College, Kilrymont) and replace it with a school or further education campus designation.

8. Delete reference STA 005 (Madras College, South Street), page 167, from the plan.

9. In the Inset Map for St Andrews, delete Proposal STA 005 (Madras College, South Street) and retain its school or further education campus designation.

10. Delete reference STA 013 (Pipeland Farm), page 169, from the plan.

11. In the Inset Map for St Andrews, delete Proposal STA 013 (Pipeland Farm) and reinstate the green belt boundary at this location as shown on the Inset Map for St Andrews in the 2012 adopted St Andrews and East Fife Local Plan.

12. In the Fife Spatial Strategy, under the St Andrews Area Strategy, paragraph 61, page 16, delete the second and third sentences, and replace them with the following text so that the paragraph reads:

   "The importance of the St Andrews green belt is underpinned by TAYplan and the policies in this plan. There is a need for a new secondary school in the St Andrews area to replace the existing Madras College. The council, as planning authority, in its assessment of the alternative locations will have proper regard to planning considerations."

13. In the Settlement and Countryside Plan Proposals table, insert East Sands as a development opportunity in the Settlement Plan Proposals table for St Andrews, so that the entry reads:
“Ref:
Location: East Sands
Area (ha): 13
Description: Development opportunity
Est capacity (Housing): -
Lead agency: Fife Council, University of St Andrews, The Crown Estate, St Andrews Harbour Trust, Private Sector
Status, additional development requirements, and other information: The approved East Sands Urban Design Framework (2010), including any updated or amended version of the document, will be a key consideration in the determination of proposals for the East Sands area, which extends from St Andrews Harbour to the Brownhills cliffs. Updated or amended versions of the design framework will be the subject of consultation with the community.

Development at East Sands is likely to take place over a number of years in several phases and by different landowners/developers. The purpose of the Urban Design Framework is to describe how design policies and principles should be implemented to control, guide and promote this change in a co-ordinated manner. The document provides a broad framework for buildings, movement and spaces that will inform more detailed development briefs, masterplans, and planning applications in the future.

Flood risk assessments will be required where appropriate.”

14. In the Inset Map for St Andrews, add a new development opportunity area at East Sands, based on the boundaries of the East Sands allocation (STA 08) shown on Inset Map 48 for St Andrews in the 2012 adopted St Andrews and East Fife Local Plan.

15. In reference STK 003 (Bonfield Road, Strathkinness), page 175, adjust the third paragraph of the additional development requirements so that it reads:

“A phased approach to development may be required to avoid capacity issues at Strathkinness Primary School.”

16. In reference LWD 021 (Craigtoun Country Park), page 186, adjust the last paragraph of the additional development requirements so that it reads:

“Any development proposals are likely to require a Flood Risk Assessment. Design of development must take account of the findings of the flood risk assessment and must ensure that appropriate buffer strips are provided alongside the watercourses in the allocation to protect and improve the water environment.”

17. In the Settlement and Countryside Plan Proposals table, insert Northbank Farm, Cameron as a development proposal in the Countryside Area Proposals (outwith town and village boundaries) table, so that the entry reads:

“Ref:
Location: Northbank Farm, Lathockar
Area (ha): 9.4
Description: Visitor centre, 20 holiday units, and 15 houses
Est capacity (Housing): 15
Lead agency: Private Sector

963
Status, additional development requirements, and other information: This site has planning permission (15/00727/ARC)
Habitats Regulations Appraisal Mitigation: Proposals must demonstrate that the development would not adversely affect the integrity of the Cameron Reservoir SPA either alone or in combination with other plans or projects.

18. In the Proposals Map, add a new development proposal at Northbank Farm, Lathockar, based on both the boundaries shown for the site which received approval required by conditions through application 15/00727/ARC, and the description set out for the proposal at 17 above.
## Issue 17
### Cupar Area

<table>
<thead>
<tr>
<th>Development plan reference:</th>
<th>Reporter: Richard Dent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Settlement Plans – Ceres (page 42); Cupar (pages 57 – 60); Cupar Muir (page 60); Dairsie (page 61); Peat Inn; Pitscottie; Springfield (page 164) and Countryside Area (Proposal LWD 005, page 182).</td>
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</tbody>
</table>

### Body or person(s) submitting a representation raising the issue (including reference number):

#### CERES
**Ceres issues**

- Ceres & District Community Council (2)
  - Mark R D Fleming (1900)
  - Lundin Homes (2071)

- **CER001**
  - Ceres & District Community Council (3, 1355)
  - Robin Bennett (18)
  - Judy Dean (58)
  - Jamie W Rose (59)
  - Gillian Rose (151)
  - Martin Dean (252)
  - D M Lindsay (724)
  - Mhairi Ferguson (1370)
  - Euan Sweeney (1446)
  - Peter Anderson (1487)
  - Alison Thomson (1489)
  - Mary Sweeney (1582)
  - Colin Mason (2267)
  - Elaine Mason (2274)
  - Hargreaves (2795)

#### CUPAR
**Cupar issues**

- C Addison-Scott (1280)
- Thomas Candlish (1524)
- Kenneth Riddoch (1548, 1571)

- **CUP007**
  - Royal Burgh of Cupar & District Community Council (3677)

- **CUP008**
  - Royal Burgh of Cupar & District Community Council (3677)

- **CUP009**
  - SEPA (3349)

- **CUPAR MUIR**
  - Cupar Muir issues

- **CPM001**
  - Neil Munro (689)
  - Cupar and North Fife Preservation Society (2635)

- **DAIRSIE**
  - Ian Byers (609, 1683)
  - David Mooney (1073)
  - Alastair Dawson & Yvonne Wardrope (3736)

- **HARGREAVES**
  - Rent a Skip (90)
### CUP001
- CALA Management Ltd and W B Baye & Son (2220, 2218, 2219)
- Royal Burgh of Cupar and District (74)
- Senga Munro (88)
- Roderick Gauld (237)
- Katherine & George McQuitty (291)
- Ian C Copland (302)
- Harald Gavin (499)
- D B M Rollo (616)
- Henry Waters (735)
- Carrie Fox (803)
- John McNaughton (827)
- Simon Hiles (963)
- Peter & Wendy Baylis (1203)
- Cupar North Partnership (1365)
- George Evans (1456)
- Denise Wilson (1488)
- Roderick Gauld (1558)
- Ashfield Land Ltd (1756)
- A & J Stephen Ltd & T N Gilmartin (2130)
- Cupar Community Groups (2499)
- Elizabeth Shearer (2601)
- Cupar and North Fife Preservation Society (2638)
- Ceri Williams (2967)
- Sue Williams (2975)
- Anthony Fusaro (3051)
- Janice Martin (3119)
- Lynne White (3245)
- SEPA (3347)
- Lynda Martin (3496)
- Neil White (3504)
- Rachel White (3522)
- NHS Fife (3842)

### PITSCOTTIE
- Richmond Homes (2076)

### SPRINGFIELD
- Springfield Issues

- George Adamson (1)
- Rachel McGregor (81)
- Norma Gibson (179)
- J G Lang & Son (2185, 2189, 2191)
- Hugh Satenon (2633)
- Malcolm Dick (2637)
- S Colligan (2640)
- Amanda McKenzie (2641)
- Rob Hall (2642)
- Shaun Allison (2643)
- Neville (2649)
- Hilda Begg (2651)
- Andrew Simmers (2652)
- S Stock (2654)
- Shelley Styles (2657)
- Nicholas Styles (2658)
- Stewart Gray (2659)
- Bruce Lowden (2660)
- Michele Smith (2661)
- Iain Boylan (2662)
- Ian Wheeler (2663)
- Evan Davidson (2665)
- Mhairi Anton (2669)
- W Allan (2671)
- L Anton (2673)
- Ken Anton (2675)
- Calum McKenzie (2678)
- Philip Gibson (2680)
- Rosemary Graham (2681)
- Sean Ledder (2682)
- James Murray (2685)
- George Adamson (2687)
- Rachel McGregor (2690)
- Irene Dalrymple (2696)
- Caroline Campbell (2706)
- E Adams (2708)
- Colin Petrie (3379)
- Springfield Community Council (3446)
- Norma Gibson (3789)

### SPF002
- Laura Simpson (121)
- Lynne Rice (127)
### CUP006 (cont)

- John Topliss (823)
- Royal Burgh of Cupar and District (1009)
- Alison Scott (1477)
- Michael O’Gorman (2187)
- Cupar Community Groups (2502)
- Cupar and North Fife Preservation Society (2639)
- Janice Martin (3123)
- Janet Wilson (3426)
- Ian Jones (3430)
- Helen Terwey (3434)
- David W L Smith (3437)
- Peter Davidson (3440)
- Maureen Waters (3441)
- H Waters (3443)

### SPF002 (cont)

- Andrew Budge (383)
- Donald Ellis (1471)
- Louise Davidson (3721)

### COUNTRYSIDE AREA

- LWD005
- SEPA (3562)

### Provision of the development plan to which the issue relates:

Settlement Plans – Ceres (page 42); Cupar (pages 57-60); Cupar Muir (page 60); Dairsie (page 61); Peat Inn; Pitscottie; Springfield (page 164) and Countryside Area (LWD 005) (page 182).

### Planning authority’s summary of the representation(s):

#### CERES

**CER001 - Doves Loan**

Ceres & District Community Council (3, 1355), Judy Dean (58), Jamie W Rose (59), Gillian Rose (151), Martin Dean (252), D M Lindsay (724), Mhairi Ferguson (1370), Alison Thomson (1489), Peter Anderson (1487), Mary Sweeney (1582), Euan Sweeney (1446), Colin Mason (2267), Elaine Mason (2274) object to the inclusion of the above site on one or more of the following issues:

**Principle of Development**

- Lack of robust assessment of beneficial and adverse impacts of the site at the Strategic Environmental Appraisal stage and disagree with scoring mechanism.

**Scale and Location**

- The site lies outwith the village envelope.

**Landscape, Townscape, Views and Character**

- Visual impact on the surrounding area; character of the village and conservation area.
- Site is without shelter, bleak and exposed to the elements.
- Development will result in the destruction of cultural assets; detracting from the character of the village and affecting a historic wall.
- Scenic appeal of village would be ruined with the advent of “modern” concrete.
skyline.
- Loss of views.

**Transport**
- Dangerous site access.
- Increased traffic will lead to both pedestrian and road safety concerns.
- Existing parking issues in village.

**Infrastructure and Services**
- Insufficient amenities in village.
- There is existing drainage and flooding problems with the site; if developed it could result in flooding and impact negatively upon the property (known as “Seceders”) located near the site entrance.
- Do not believe that run-off water can be adequately controlled by a Sustainable Urban Drainage System of the scale that would be available within the site.

**Amenity**
- Negative effect on lifestyle and residential amenity; the sloping nature of the site will result in overlooking of existing properties within the village, loss of privacy and light.

**Environment**
- Air quality – no local industry to support new homes so residents would need to drive to work polluting atmosphere.

**Miscellaneous**
- Lack of consultation.
- Planning history – refusal of two planning applications and appeal dismissed.
- Development would potentially cut off their dwelling from plot of land owned by objector.
- Negative effect on value of property.

Robin Bennett (18) supports the allocation of the site on the grounds that:
- The site restores the balance of the village and would not markedly affect the character of village.
- The allocation helps to meet demand for housing preferably affordable
- Conditions can be imposed with regards drainage/flooding
- If justified measures can be taken to slow traffic on Anstruther Road.

Hargreaves (2795) suggested that, as the area is known to over lie a potential shallow coal reserve, the opportunity to recover the shallow coal deposit prior to, or as an integral part of, the development be recognised to prevent unintentional sterilisation.
Sites (not in the Proposed FIFEplan) proposed by Objectors

Candidate site LDP-CER001- Land to East of Ceres

Lundin Homes Ltd (2071) object to omission of candidate site LDP-CER001 as set out within the FIFEplan Site Assessments Reports, the relevant extract from the Site Assessment Report is appended to this submission. They argue inclusion on the following grounds:

- In order to meet the TAYplan housing land requirement at the rates identified it is imperative that FIFEplan allocates additional sites across a much broader range of settlements, the above site offers prime potential to assist in meeting targets.
- The site is fully effective in relation to ownership, physical characteristics, contamination, deficit funding, marketability, infrastructure and land use.
- Site currently identified for Ceres at Doves (CER-003) loan is considered unsuitable in terms of physical relationship to the settlement edge and scale necessary to assist in sustaining local services for the wider community.
- There is insufficient scope within allocated site CER001 (Candidate site CER003) to achieve delivery of 12 units whilst also incorporating an appropriate landscaping solution to ensure that the site achieves a satisfactory relationship with the existing settlement and does not detract from the character of the village on this high profile elevated site.

Candidate site LDP CER004 – Land at Baltilly

Ceres & District Community Council (2), Mark R D Fleming (1900) Support land at Baltilly House (LDP CER004) as a housing site on the grounds that:

- The site has no drainage problems.
- Access is readily available from the existing driveway.
- The site can accommodate residential development as it would be visually contained by existing shelterbelts and landform/setting.
- There is no longer dispute over potential flood risk.
- Footprint would avoid any biodiversity impact.
- The land is within closer proximity to town centre and facilities than the preferred site.
- The location is sustainable.

CUPAR

Cupar Issues

Cupar and North Fife Preservation Society (2634) - development of brownfield land and derelict sites within Cupar should be a priority to ensure that these sites are developed wherever possible at an early stage. Where there are difficulties in achieving development or reluctance on the part of land owners to agree, Fife Council should consider using powers available to them to bring development forward. Sites which require active intervention are former ATS garage, St. Catherine Street (CUP006) and former St. Columba site (CUP002).

Royal Burgh of Cupar & District Community Council (3677) is content with the detailed policies and supplementary guidance and commends the land use strategy for Fifeplan. The Community Council welcomes and supports all policies as stated in the document.
CUP001 – Cupar North Strategic Development Area

Senga Munro (88); Elizabeth Shearer (2601); Dr Carrie Fox (803); Ceri Williams (2967); Sue Williams (2975); Lynne White (3245); Neil White (3504); Rachel White (3522); Katherine & George McQuitty (291); Roderick Gauld (237, 1558); Ian C Copland (302); Harald Gavin (499); Dr Henry Waters (735); John McNaughton (827); Simon Hiles (963); Peter & Wendy Baylis (1203); Prof George Evans (1456); Anthony Fusaro (3051); Janice Martin (3119); Lynda Martin (3496); Denise Wilson (1488) object to the allocation of site CUP01 on one or more of the following grounds:

Principle/Scale of Development

- The development fails to follow national; strategic or local policy (expanded upon within representations (88), (2601), (803), (2967), (2975), (3245), (3504) and (3522).
- The Strategic Development Area is out of date and needs to be reviewed – original 20 year strategic policy set in 2006 has failed to be delivered within timescales.
- There is no evidence of established need – development is out of proportion with demand.
- Out of scale for its location.
- Incompatible with surrounding land uses.
- It is important for Cupar to maintain a vibrant core and the northern relief road and the associated Cupar North development (with suburban sprawl housing) would detract from this objective.
- This is essentially a new town; if more houses are needed there are many areas in Cupar which could be used for housing; develop flats and town-houses within or near the town centre providing residences with easy access to shops and public transport.

Landscape, Townscape, Views and Character

- The development will result in a loss of prime agricultural land; there are numerous brownfield sites available within Cupar for development.
- The scale of development will have a detrimental and environmental impact on the area and will be a visual blight on the landscape.

Transport

- The necessity of the proposed bypass is queried and concerns raised over its implementation.
- Vehicular access arrangements should be taken into consideration as part of the development and the need to avoid potential congestion.
- Construction traffic should be kept out of town.
- The existing routes between Cupar North and the town centre are inadequate for existing traffic, let alone further major development.
- The A91 will not withstand yet another junction/ roundabout between trading estate and Ferniehall Cottages.

Economy

- Detrimental impact on existing businesses/services/tourism.
- Demand for business units has been sought.
### Infrastructure and Services
- Implication on existing services – sewers, roads and education & health provision.
- Drainage and flooding issues remains an ongoing concern.
- Assurances are required that, after the completion of houses and industrial units on land below Middlefield Farm, there will be no flooding to the existing industrial estate, Landale Gardens or Thomastoun Drive.
- Question the replacement of land allocated for a community facility in an earlier development Framework with housing.
- Education and health facilities should be strengthened and land protected for hospital expansion.
- Consideration should be given to provision of allotments and playing fields.

### Environment
- The proposed development is unsustainable - increase need for car based travel brings unacceptable levels of visual, noise and light pollution.
- The existing wind turbine, existing wildlife access and existing access arrangements should all be taken into account in the development framework.
- If sustainable forms of transport are to be encouraged then alternative sites to the south should be utilised for housing; Tesco South Road site being one such site.
- Concerns over potential noise, light and air pollution from industrial units in the lower fields of Middlefield.

### Miscellaneous
- The plan is developer led.
- Land ownership queried (see representations (237) & (1558) for further details)
- Lack of information/transparency over this development.

Royal Burgh of Cupar & District Community Council (74, 3677) have always maintained objections to the number of houses proposed for this area due to intensity of development and lack of adequate infrastructure in the existing built area and the conditions of the Town Centre. Further clarification is sought on secondary school funding; community recycling centre and health care provision. Flood Risk Assessment and Transport Assessment should be extended to include an Environmental impact Assessment.

Concerns have been raised on the deliverability of a relief road to be funded by developers based on the development of 1400 houses. The Community Council would like to see any proposed road construction to the north to be completed before the housing development is complete and such road should connect existing built areas and the town centre.

The Plan for Cupar North should be clear that the land around the Hospital and Dental Unit is for healthcare expansion and not for houses or any other development. Existing healthcare facilities should be safeguarded from encroachment by non-compatible uses. Verification is therefore required that land around the Hospital and Dental Unit is protected from non-healthcare development.

Although they oppose the development they accept that development will go ahead and...
so the Community Council will work with the developers and Fife Council to get the best for Cupar. Although if the Cupar North development is progressed then other Greenfield sites such as Tarvit Farm should remain untouched.

CALA (2218, 2219, 2220) do not intend to campaign against the site. Cala's contention, and in supporting an additional allocation at Ferryfield (see under Sites (not in the Proposed FIFE plan) proposed by Objectors, below), remains that Cupar North will not deliver 1,400 homes in the plan period to 2024 (Strategic Development Plan period) or 2026 (Local Development Plan Period). Cala continues to believe that the issues with the Cupar North SDA can be dealt with, in part, in a local context. There are credible and deliverable sites, including Ferryfield, to provide a range of house types and tenures in the short-term to reduce the increasing pressure on housing land caused by the continuing delays in the delivery of Cupar North coupled with the Council’s current position that Cupar North must continue to be the only allocation. CALA is broadly supportive of the range of policies for Cupar contained in the Proposed Plan, and considers that these policies support their proposal.

This representation should be read in conjunction with an attached report that provides a detailed and comprehensive justification for the allocation of the site at Ferryfield, Cupar for up to 100 houses.

Cupar Community Groups (2499) - necessity to establish a mechanism for the community to engage effectively with the developers as the project proceeds.

Cupar and North Fife Preservation Society (2638) – whilst not objecting to the principle of development, the Society wishes to ensure adequate opportunity is given to engage formally with developers. Concerns raised regarding impact of such a large development on the edge of town and the measure of success will be in how the progress of development can be integrated without serious adverse impact on the amenity, landscape setting and functioning of the town throughout the development process and the impact of development on existing services, assurances are required that investment in public services and physical infrastructure will proceed in tandem with development progress.

NHS Fife (3842) - Potential additional 1400 houses in local area could impact on healthcare services. Discussions are already taking place between NHS Fife, Fife Council and developers to ensure consideration of potential population increases are addressed. Understanding of timescale for developments would assist in planning of potential changes in delivery of healthcare services.

D B M Rollo (616) support the identification of the site for residential use on grounds that:

- Land available in their ownership is outwith control of the Consortium but is available for residential development.
- In the event that smaller area of land is required for additional health care facilities then further land remains as allocated i.e. for residential use.
- Majority of land lies within Cupar settlement boundary.
- Strategic Land Allocation (SLA) developers should be required to enter into legal agreements to ensure the road system and provision of services shall be taken to boundary of adjoining developable land. If the SLA is to be delivered, such a
Cupar North Partnership (1365) and Ashfield Land Ltd (1756) support the allocation on the following grounds:

- Cupar North has control over the significant part of the site to deliver the required relief road.
- Background to the strategic land allocation is provided within the original representation details include Fife Structure Plan/TAYplan/St Andrews and East Fife Local Plan allocations, FIFEplan Main Issues Report/Site Assessment submissions and update on Development Management matters.
- Site must not be undermined through allocation of new housing land within the Housing Market Area (HMA) and/or the delinking of the Gilliesfauld part of Cupar North – potentially serious consequences for the delivery of the far larger and more critical part of Cupar where the relief road will run.
- The land in Rollo’s ownership, adjacent to Adamson Hospital and the GP surgeries is logical location for additional health facilities.
- Residential development on Rollo’s land is not deliverable as vehicular access is known to be required through land in control of Cupar North Partnership; there are no other known means of satisfactorily accessing this site.

T & N Gilmartin (2130) support the continued allocation of Gilliesfauld’s West, in addition:

- The site has the ability to come forward for development timeously and separately from the Cupar North Strategic Land Allocation.
- Pre-Application discussions have taken place and work is currently ongoing regarding the formulation of the Masterplan and technical detail to inform the process of pre-application public engagement and the subsequent application for planning permission.

SEPA (3347) supports the inclusion of the site subject to requirements.

Roderick Gauld (237, 1558) has attached documents which provide evidence of ownership of land immediately to the north of property at 19 Back Lebanon, Cupar and requested that the necessary steps be taken to delete this land as land for development.

CUP002 – St.Coumba’s, CUP003 – Kirk Wynd & CUP004 – Provost Wynd

Royal Burgh of Cupar & District Community Council (3677) notes the status of/supports development on these sites and would prefer to see affordable housing on site, encourage Fife Council to assist in bringing it to fruition.

CUP005 – Former Granary Site, Station Road

Royal Burgh of Cupar & District Community Council (3677) agrees with the development as proposed.

SEPA (3252) request expansion of the developer requirements to specify the need for a flood risk assessment and ensure that no built development takes place on the functional flood plain (or within an area of known flood risk) will help promote a sustainable approach to managing flood risk. This is in accordance with the Councils
duties under the FRM Act and is also in keeping with Proposed Plan Policy 12, Flooding and the Water Environment.

**CUP006 – Former ATS Depot, St. Catherine Street/East Bridge**

Cupar and North Fife Preservation Society (2639) - Following demolition of the former ATS garage it became apparent that fine views had been opened up, particularly approaching from the east, and revealing the classical facade of the County Buildings. A number of local societies including CNFPS expressed concern regarding the councils development brief which if implemented would close off the newly revealed views in to and out of the conservation area. CNFPS agreed to fund a design project to consider how the site might best be treated; this project has received wide community support through the design project under consideration as follows: landscaping of the site as an open space (option 1); adoption of the CNFPS sponsored project as a brief for the development of the area (option 2) and re-adoption of the local authority design brief (option 3) (See Supporting Documents SD1, SD2 and SD3).

While it is accepted that the CNFPS project will require to be refined and developed in detail it is submitted that Option 2 represents the best potential solution for the site. The public open space option was rejected since not only would this result in a continuing maintenance obligation for the council; it would also miss the chance of achieving a high quality development on a prestigious site at the entry to the conservation area. These submissions on behalf of CNFPS are made in the expectation that Refinements may be made to the text of the local plan to accommodate the concerns and proposals outlined above.

John Clark (131) is of the view that this site would be best served by providing a well-designed civic/amenity/public open space area (option 1). This is a unique opportunity to provide something special to enhance the approach into Cupar.

John Topliss (823); Royal Burgh of Cupar & District Community Council (1009); Alison Scott (1477); Michael O’Gorman (2187); Cupar Community Groups (2502); Janice Martin (3123); David W L Smith (3437); Peter Davidson (3440); Janet Wilson (3426); Ian Jones (3430); Helen Terwey (3434) Support partial redevelopment of the site (Option 2).

Maureen Waters (3441); Dr H Waters (3443) support full redevelopment of the site (Option 3) as per the adopted Site Planning Brief.

**CUP007 – Moathill Site**

Royal Burgh of Cupar & District Community Council (3677) does not support development on this site, prefer for it to remain as green space.

**CUP008 – Bonnygate Gap Site**

Royal Burgh of Cupar & District Community Council (3677) continues to encourage Fife Council to assist in sourcing appropriate developer to help take this forward. The development of this site would enhance the town centre and the environment greatly.

**CUP009 – Prestonhall East**

SEPA (3349) supports the inclusion of the site subject to requirement for a Flood Risk
Assessment to be undertaken.

Sites (not in the Proposed FIFE plan) proposed by Objectors

Candidate Site LDP-CUP001 – Ferryfield, Brighton Road

CALA (2218, 2219, 2220) objects to the non-inclusion of Candidate Site LDP-CUP001, believing that there are credible and deliverable sites, including Ferryfield, to provide a range of house types and tenures in the short-term to reduce the increasing pressure on housing land caused by the continuing delays in the delivery of Cupar North, coupled with the Council’s current position that Cupar North must continue to be the only allocation.

Candidate Site LDP-CUP003 – Tarvit Farm, Pitscottie Road

Campion Homes (2951) objects to the non-inclusion of Candidate Site LDP-CUP003. Cupar North SDA has progressed very little over the last 2 years; there is no realistic prospect of housing being delivered within Cupar North SDA within the near future. As a consequence, the chronic shortage of other land being available for housing in the short to medium term will continue unless other sites are allocated for housing in and around Cupar. Candidate Site LDP-CUP003 is unconstrained, fits well with the landscape and is deliverable.

Candidate Site LDP-CUP004 – South Road

C Addison-Scott (1280) objects to the non-allocation of the South Road site for residential development as it is contended that the site is effective and suitable for development. While the delivery of the strategic development of Cupar North continues to be delayed there is an increasing need for short-term release of small scale development opportunities, the allocation of the site at South Road would allow early release for development and would go some way to ensuring a continuous supply of housing land.

However, Thomas Candlish (1524); Kenneth Riddoch (1548, 1571) and R Gilchrist (3060) fully support Fife Council’s decision to exclude candidate site LDP-CUP004 from the proposed Fife Plan on the following grounds:

- This site is currently in agricultural use, is out with the current town boundary, and not integrated with the town.
- Development of this site would not represent a natural extension of the settlement boundary.
- This has a significant visual impact on one of the main approaches to Cupar, including from the A916.
- Constitutes an isolated projection of urban development into the rural setting on the west side of South Road.
- Sufficient land has been allocated across the Cupar and Northwest Fife Housing Market Area to meet its statutory requirements
- Within Cupar there are several Brownfield Housing Opportunity and Development Opportunity Sites within the town which would provide preferable locations for similar scale (and larger) housing development.
CUPAR MUIR

Cupar Muir Issues

Cupar and North Preservation Society (2635) - Representations submitted in respect of use and development of brownfield land and derelict sites within Cupar Muir. It should be a priority to ensure that these sites are developed wherever possible at an early stage, where there are difficulties in achieving development or reluctance on the part of land owners to agree, Fife Council should consider using powers available to them to bring development forward. Sites which require active intervention are former Sawmill Cupar Muir (CUP001) and the derelict walled garden Cupar Muir.

CPM001 – Sawmill

Rent a Skip (90) support the strategy for Cupar & Howe of Fife to provide opportunities for additional small and medium scale development to complement Cupar North Strategic Development Area and support the continued allocation of this site in the Proposed Local Development Plan. This proposed development will provide much needed new housing to complement the larger longer-term development to the north of Cupar.

Sites (not in the Proposed FIFEplan) proposed by Objectors

Neil Munro (689) objects to the non-inclusion of the former walled garden site to the north-east of Cupar Muir within the settlement envelope. The following reasons have been cited in support of this objection:

- Site lies adjacent to existing settlement and is occupied by ruins of a former walled garden the majority of which benefits from planning permission in principle for affordable housing.
- As it stands it has an adverse effect on character and appearance of the area and clearly detracts from the setting of both the village and distant listed building.
- Redevelopment proposals will create a visual improvement to the character and appearance of the area improving the setting of the village and listed building.
- Proposed woodland planting will provide a natural green barrier preventing coalescence with Cupar whilst enhancing the bio-diversity of the area.
- Although the site is located on prime quality agricultural land it has not been in agricultural use for over 20 years and is not considered suitable for conventional agricultural purposes.
- Recent appeal decision provides support for the current request – key conclusions arrived at by the Reporter are included within the objection.

DAIRSIE

DAI001 – South of Osnaburgh Court

Ian Byers (609, 1683) objects on grounds that:

- No housing needs assessment has been undertaken for this site and demand for housing is low.
- Site close to Cupar North SDA – potential conflict.
Prime agricultural land.
Poor access to site causing additional traffic problems.
Deliverability - poor intent shown by landowners in past.
Previous feedback not taken into account.

David Mooney (1073) - Site not useful area for additional housing, demand for housing slow. Development would spoil views of existing landscape and create potential privacy issues. Fife council should examine other options where there is an increase demand for housing.

Alastair Dawson and Yvonne Wardrope (3736) – The site owners support the allocation of Proposal Site DAI001 within the proposed FIFEplan for housing. However, they object to the number of houses being limited to 40, and they also object to the house heights being limited to single storey. The site is capable of accommodating a mix of single storey, one and a half storey and a limited number of 2 storey houses, whilst still achieving a low density layout which protects the views from Osnaburgh Court, reflects the rural setting of the site and maintains the opportunity for larger gardens or allotments.

PEAT INN

Tim Esparon (134) is seeking an amendment to the settlement envelope of Peat Inn to allow for organic growth of the settlement, indicating that there are no current gap sites in the village to accommodate any new development.

PITSCOTTIE

Sites (not in the Proposed FIFEplan) proposed by Objectors

Candidate Site LDP-PIS001 – Cupar Road

Richmond Homes (2076) objects to the non-inclusion of Candidate Site LDP-PIS001 for housing at Pitscottie on the basis that it could contribute towards meeting the housing land requirement and can overcome previously indicated concerns regarding flooding constraints and landscape impact.

SPRINGFIELD

SPF002 – East of Crawford Park

Laura Simpson (121); Lynne Rice (127); Andrew Budge (383); Donald Ellis (1471) object to the allocation of the site on one or more of the following grounds:

Principle of Development

- The development is unjustified.
- There doesn't seem to be a housing need for such a large development in the village.
**Scale and Location**
- The proposed development should be limited to 35 houses to be in keeping with Crawford Park and surrounding modern developments.
- Increasing the number to 50 would place too much strain on the village and specifically road access.
- Previous consultation with village led to a reduction from 50 to 20 houses; this decision has now been reversed and residents would like to see the report on which this decision was made.

**Landscape, Townscape, Views and Character**
- Difference in land levels between proposed and adjoining site.

**Transport**
- No safe vehicular entrance to the site.
- Increase in traffic volume.
- Road safety concerns.

**Economy**
- Lack of employment

**Infrastructure and Services**
- Concerns over capacity of primary school.
- Village does not have the amenities to support such a development.
- Potential flooding and drainage issues.

**Environment**
- Noise pollution.
- Noise and safety issues in relation to the railway line/station.

**Housing/Affordable Housing Issues**
- Any houses built should be in keeping with existing dwellings close by, be allocated for private sale or shared equity to buy schemes and flats would not be appropriate in this area.

Louise Davidson (3721) fully supports Fife Council's decision to retain this site as a housing site. The site can be delivered in the short term, is free from any technical constraints and negotiations are well advanced with a major house builder in relation to developing the site for housing. It is likely that housing on the site will be delivered in the very near future. It has been confirmed that there is sufficient primary school capacity within Springfield; however there may be a requirement to make financial provision for secondary school capacity.
### Sites (not in the Proposed FIFEplan) proposed by Objectors

**Candidate Site LDP-SPF001 – Land to South of Springfield**

J G Lang & Son (2191, 2189 & 2185) support inclusion of Candidate Site LDP-SPF001. The Masterplan illustrates that the site can accommodate up to 71 houses, through a layout which has had regard to the characteristics of the site and the surrounding area. The proposal makes provision for 2 accesses into the site in accordance with the requirements of Transportation Services at Fife Council. Kingdom Housing Association has expressed strong support for the delivery of affordable housing provision within the site and Parks and Recreation at Fife Council have confirmed support for the recreational provision proposed as part of the proposal which will bring community benefits in providing for recognised need in the area. The allocation of Springfield South in the FIFEplan would enable effective housing land to be delivered in the area, and ensure a continuous 5 year supply pending the uncertainty of delivery surrounding the SDA at Cupar North.

Andrew Simmers (2652) supports previously submitted site for 70 houses on fields either side of Manse Road (LDP-SPF001 Land to the South of Springfield in Development Strategy Consultation) as it would increase the school role protecting the school from closure and there is a lack of housing for sale around £100K.

Stewart Gray (2659) supports previously submitted site for 70 houses on fields either side of Manse Road (LDP-SPF001 Land to the South of Springfield in Development Strategy Consultation) if it was for affordable housing.

Springfield Community Council (3446) – Three responses to consultation on the Local Development Plan support the site with 31 responses opposing it on the grounds of size and scale of proposal in relation to the existing village; already unused plots in village for over 60 additional houses and pace of change in village.

George Adamson (1); Rachel McGregor (81); Norma Gibson (179); Hugh Satenon (2633); Malcolm Dick (2637); S Colligan (2640); Amanda McKenzie (2641); Rob Hall (2642); Shaun Allison (2643); Mr & Mrs Neville (2649); S Stock (2654); Shelley Styles (2657); Nicholas Styles (2658); Bruce Lowden (2660); Michelle Smith (2661); Iain Boylan (2662); Ian Wheeler (2663); Evan Davidson (2665); Mhairi Anton (2669); Mr & Mrs Allan (2671); L Anton (2673); Ken Anton (2675); Calum McKenzie (2678); George Adamson (2687); Rachel McGregor (2690); Caroline Campbell (2706); Philip Gibson (2680); Rosemary Graham (2681); Sean Ledder (2682); James Murray (2685); Irene Dalrymple (2696); E Adams (2708); Norma Gibson (3789); Hilda Begg (2651); Colin Petrie (3379) support the non-inclusion of the site for one or more of the following reasons:

### Principle of Development

- The land east of Crawford Park, in the current Local Plan, is a more logical site for the future development in Springfield in terms of Transportation and site location.
- To include the land south of Springfield, together with the land east of Crawford Park, would represent a disproportionate over-development of the village of Springfield.
- There is no indication of the need for further housing in the village; already unused plots for over 60 additional houses in village.
Scale and Location

- A potential further large development in Springfield seems out of keeping with the size of the village and the amenities available.
- The land east of Crawford Park, in the current local plan, would be a more logical site, in terms of transportation and site location.

Landscape, Townscape, Views and Character

- Loss of Greenfield land.

Transport

- The village already experiences a huge amount of through traffic and access to the site is problematic.
- Increased traffic.
- Create traffic noise/pollution
- Location adjacent to railway line unsafe.
- Increase of traffic at that junction would be dangerous.

Infrastructure and Services

- The land identified is subject to some flooding.
- Springfield does not have the amenities to support a large housing project.
- Failure for infrastructure to cope with additional housing including existing sewage/drainage system.
- Flooding risk.
- Concerns over capacity of school.
- Loss of children’s play park.
- Support provision of community/leisure facilities rather than housing.

Amenity

- Loss of views/privacy.

Miscellaneous

- Pace of change in village.
- Devalue properties.

COUNTRYSIDE AREAS

LWD005 – Russell Mains, Springfield

SEPA (3562) support the inclusion of a Site Requirement for a buffer strip along the watercourse as this measure will help protect and improve the water environment and support the inclusion of the requirement to consider through a feasibility study, the potential for restoration and improvement of the water environment through the site design.
Modified at those submitting representations:

CER001 – Doves Loan

Ceres & District Community Council (3, 1355); Judy Dean (58); Jamie W Rose (59); Gillian Rose (151); Martin Dean (252); D M Lindsay (724); Mhairi Ferguson (1370); Alison Thomson (1489); Peter Anderson (1487); Mary Sweeney (1582); Euan Sweeney (1446); Colin Mason (2267); Elaine Mason (2274): remove Proposal CER 001 from FIFEplan.

Robin Bennett (18): none stated.

Hargreaves (2795): amend proposal to include a reference to non-sterilisation of coal deposits.

Sites (not in the Proposed FIFEplan) proposed by Objectors

Candidate site LDP-CER001 – Land to East of Ceres

Lundin Homes Ltd (2071) Allocate land at Candidate Site LDP-CER001 as a housing site.

Candidate site LDP-CER004 – Land at Baltilly

Ceres & District Community Council (2); Mark R D Fleming (1900): Allocate land at Baltilly House (Candidate Site LDP-CER004) as a housing site.

CUPAR

Cupar Issues

Cupar and North Fife Preservation Society (2634); Royal Burgh of Cupar & District Community Council (3677): none stated.

CUP001- Cupar North Strategic Development Area

Senga Munro (88); Elizabeth Shearer (2601); Dr Carrie Fox (803); Ceri Williams (2967); Sue Williams (2975); Lynne White (3245); Neil White (3504); Rachel White (3522); Katherine & George McQuitty (291); Roderick Gauld (237) & (1558); Ian C Copland (302); Harald Gavin (499); Dr Henry Waters (735); John McNaughton (827); Simon Hiles (963); Peter & Wendy Baylis (1203); Prof George Evans (1456); Anthony Fusaro (3051); Janice Martin (3119); Lynda Martin (3496); Denise Wilson (1488): delete proposal CUP001.

Royal Burgh of Cupar & District Community Council (74) (3677):

- Clarify secondary school funding; community recycling centre and health care provision.
- Environmental impact Assessment required.
- Road construction to the north to be completed before the housing development is complete
CALA (2218, 2219, 2220): Allocate a site at Ferryfield, Cupar for up to 100 houses.

Cupar Community Groups (2499), Cupar and North Fife Preservation Society (2638), NHS Fife (3842), D B M Rollo (616), Cupar North Partnership (1365), Ashfield Land Ltd (1756), T & N Gilmartin (2130); SEPA (3347): none stated.

Cupar North Partnership (1365); Ashfield land Ltd (1756) seek the following modifications:

- Remove following text in the second paragraph of CUP001 which states “of which development at Gilliesfauld West (168 houses) is anticipated to come forward early in the plan period, creating a high quality western gateway to town.”
- Replace with the following text “Housing at Gilliesfauld West (168 houses) is to be built out on an annual pro rata basis with the remainder of the CUP001 houses, creating a high quality western gateway to the town. Any planning application for Gilliesfauld will require to be supported a full suite of technical reports scoped to include all of CUP001”.

CALA (2218, 2219) seek modifications to alter Strategic Development Area to become a Cupar Strategic Development Area. Within this further allocations to be made to meet short-medium term housing land shortfall including Ferryfield, Brighton Road, Cupar for up to 100 units. This would give Cupar the best chance of meeting its housing land supply commitment.

Roderick Gauld (237) & (1558): remove land in Mr Gauld’s ownership from proposal CUP001.

CUP002 – St.Coumba’s, CUP003 – Kirk Wynd & CUP004 – Provost Wynd

Royal Burgh of Cupar & District Community Council (3677): none stated.

CUP005 – Former Granary Site, Station Road

Royal Burgh of Cupar & District Community Council (3677): none stated.

SEPA (3252) request expansion of the developer requirements to specify the need for a flood risk assessment and ensure that no built development takes place on the functional flood plain.

CUP006 – Former ATS Depot, St.Catherine Street/Station Road

Cupar and North Fife Preservation Society (CHFPS) (2639) - Following demolition of the former ATS garage it became apparent that fine views had been opened up, particularly approaching from the east, and revealing the classical facade of the County Buildings. A number of local societies including CNFPS expressed concern regarding the councils development brief which if implemented would close off the newly revealed views in to and out of the conservation area. CNFPS agreed to fund a design project to consider how the site might best be treated; this project has received wide community support. Through the design project under consideration as follows: landscaping of the site as an open space (option 1); adoption of the CNFPS sponsored project as a brief for the development of the area (option 2) and re-adoption of the local authority design brief (option 3) (See Supporting Documents SD1, SD2 and SD3).
While it is accepted that the CNFPS project will require to be refined and developed in detail it is submitted that Option 2 represents the best potential solution for the site. The public open space option was rejected since not only would this result in a continuing maintenance obligation for the council; it would also miss the chance of achieving a high quality development on a prestigious site at the entry to the conservation area. These submissions on behalf of CNFPS are made in the expectation that modifications be made to the text of the local plan to accommodate the concerns and proposals outlined above.

John Clark (131) is of the view that this site would be best served by providing a well-designed civic/amenity/public open space area (option 1). This is a unique opportunity to provide something special to enhance the approach into Cupar.

Cupar and North Fife Preservation Society (CHFPS) (2639); John Topliss (823); Royal Burgh of Cupar & District Community Council (1009); Alison Scott (1477); Michael O’Gorman (2187); Cupar Community Groups (2502); Janice Martin (3123); David W L Smith (3437); Peter Davidson (3440); Janet Wilson (3426); Ian Jones (3430); Helen Terwey (3434); Support partial redevelopment of the site (Option 2).

Maureen Waters (3441); Dr H Waters (3443) support full redevelopment of the site (Option 3) as per the adopted Site Planning Brief.

CUP007 – Moathill Site
Royal Burgh of Cupar & District Community Council (3677) seeks modification that site remains as green space.

CUP008 – Bonnygate Gap Site
Royal Burgh of Cupar & District Community Council (3677) none stated.

CUP009 – Prestonhall East
SEPA (3349) supports the inclusion of the site subject to requirement for a Flood Risk Assessment to be undertaken.

Sites (not in the Proposed FIFEplan) proposed by Objectors

Candidate Site LDP-CUP001- Ferryfield, Brighton Road
CALA (2218, 2219, 2220): Allocate Candidate Site LDP-CUP001 for housing development.

Candidate Site LDP-CUP003 – Tarvit Farm, Pitscottie Road
Campion Homes (2951): Allocate Candidate Site LDP-CUP003 for housing development.

Candidate Site LDP-CUP004 – South Road
C Addison-Scott (1280): Allocate Candidate Site LDP-CUP004 for housing development.
<table>
<thead>
<tr>
<th>Location</th>
<th>Comments</th>
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<tr>
<td>CUPAR MUIR</td>
<td>Cupar Muir Issues</td>
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<td>Cupar and North Preservation Society (2635): none stated.</td>
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<td>CPM001 – Sawmill</td>
<td>Rent a Skip (90): none stated.</td>
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<td>Sites (not in the Proposed FIFEplan) proposed by Objectors</td>
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<td>Neil Munro (689): Seeks inclusion of the site within the settlement boundary and that it</td>
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<td>either be allocated for general housing purposes or remain as “white land” within the</td>
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<td>settlement boundary.</td>
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<td>DAIRSIE</td>
<td>DAI001 – South of Osnaburgh Court</td>
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<td>Ian Byers (609, 1683); David Mooney (1073): Remove DAI001 from FIFEplan.</td>
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<td>Alastair Dawson and Yvonne Wardrope (3736) – Support for the allocation of DAI001 for</td>
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<td>housing, but seek following changes:</td>
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<td>• number of houses should be increased to between 50 and 54; and</td>
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<td>• allow a mix of single storey, one and a half storey and a limited number of 2 storey</td>
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<td>houses as part of a low-density development of the site.</td>
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<td>PEAT INN</td>
<td>Tim Esparon (134): Amend the settlement envelope of Peat Inn to allow for organic growth</td>
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<td>of the settlement.</td>
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<td>Candidate Site LDP-PIS001 – Cupar Road</td>
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<td>Richmond Homes (2076): Allocate Candidate Site LDP-PIS001 for housing development.</td>
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<td>SPRINGFIELD</td>
<td>SPF002 – East of Crawford Park</td>
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<td>Laura Simpson (121); Lynne Rice (127); Andrew Budge (383); Donald Ellis (1471): Remove SPF002 from the FIFEplan.</td>
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</tbody>
</table>
### Proposed Fife Local Development Plan

**Louise Davidson (3721):** none stated.

**Sites (not in the Proposed FIFEplan) proposed by Objectors**

**Candidate Site LDP-SPF001- land to the South of Springfield**

J G Lang & Son (2191, 2189, 2185), Andrew Simmers (2652), Stewart Gray (2659): Allocate Candidate Site LDP-SPF001 for housing and recreational development. Springfield Community Council (3446):

- 3 responses from a survey of 34 people support allocation of Candidate Site LDP-SPF001 for housing development;
- 31 responses oppose it.

George Adamson (1); Rachel McGregor (81); Norma Gibson (179); Hugh Satenon (2633); Malcolm Dick (2637); S Colligan (2640); Amanda McKenzie (2641); Rob Hall (2642); Shaun Allison (2643); Mr & Mrs Neville (2649); S Stock (2654); Shelley Styles (2657); Nicholas Styles (2658); Bruce Lowden (2660); Michelle Smith (2661); Iain Boylan (2662); Ian Wheeler (2663); Evan Davidson (2665); Mhairi Anton (2669); Mr & Mrs Allan (2671); L Anton (2673); Ken Anton (2675); Calum McKenzie (2678); George Adamson (2687); Rachel McGregor (2690); Caroline Campbell (2706); Philip Gibson (2680); Rosemary Graham (2681); Sean Ledder (2682); James Murray (2685); Irene Dalrymple (2696); E Adams (2708); Norma Gibson (3789); Hilda Begg (2651); Colin Petrie (3379): Opposed to inclusion of Candidate Site LDP-SPF001 for housing development.

**COUNTRYSIDE AREAS**

**LWD005 – Russell Mains, Springfield**

SEPA (3562): none stated.

### Summary of responses (including reasons) by planning authority:

**CERES**

**CER001- Doves Loan**

Ceres & District Community Council (3, 1355); Judy Dean (58); Jamie W Rose (59); Gillian Rose (151); Martin Dean (252); D M Lindsay (724); Mhairi Ferguson (1370); Alison Thomson (1489); Peter Anderson (1487); Mary Sweeney (1582); Euan Sweeney (1446); Colin Mason (2267); Elaine Mason (2274): Comments below in relation to Candidate Site CER004 are also relevant to consideration of this site.

**Principle of Development**

Site assessments were conducted on all potential development sites before their inclusion in the Proposed Plan (CD15). These assessments were undertaken in accordance with Section 5(3) (a) of the Environmental Assessment (Scotland) Act 2005. The SEA Environmental Report assesses the potential significant environmental impact of implementing the policies and proposals contained within the Plan across a number of
themes - this includes landscape. The Plan has therefore been assessed for the extent to which its policies protect valued landscape areas and more local features of value and how its proposals may change areas of relatively high landscape value.

Scale, Location and Landscape Setting

This site is allocated for development of 12 houses. Ceres is a smaller settlement with a limited range of facilities where a small allocation will provide opportunities for the local housing market. Development of this scale would complement the FIFEplan strategy to support the Cupar Strategic Development Area. The site is a small extension of the village, largely hidden from view by the road corner, and it is possible to accommodate sensitive development within the adjacent Local Landscape Area.

Transportation, Infrastructure and Services

It will be possible to achieve suitable access to the site and, indeed, part of the reasoning behind allocating the site was to use the development of the site, and the formation of its access, to effect a minor road improvement to the Anstruther Road to the benefit of the wider village. Although there have been representations concerned with flooding issue, the Scottish Environment Protection Agency have not required a Flood Risk Assessment for this site.

Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision. Detailed matters, such as the specifications of road access and drainage arrangements for example, will be dealt with at planning application stage.

Impact of development on property value and local amenity

Property value is not a material planning consideration. Issues relating to the amenity of existing residents such as noise, nuisance, smell, privacy, daylight etc. would be addressed at the detailed planning application stage. In this event, separate Local Development Plan policies on amenity (Policy 10) will help to protect existing amenity and assist the decision making process on planning applications.

Planning History

A previous outline planning application for the site (up to 18 units) was refused in 2009 following a departure hearing (08/00706/EOPP – see Supporting Documents SD4 and SD5), but the decision was not appealed. The application was considered to be premature as the site was not allocated for residential development in the Finalised St. Andrews and East Fife Local Plan (2009) and was deemed to be contrary to the development plan and the emerging local plan. Approval of the development would have set an undesirable precedent for sporadic unplanned expansion of settlements prior to the formal adoption of the St Andrews and East Fife Local Plan.
Lack of Consultation

Issues relating to consultation on the proposed plan are dealt with separately under the Statement of Conformity.

Robin Bennett (18): support for Proposal CER 001 is noted.

Hargreaves (2795): The issue of sterilisation is adequately addressed by Policy 15 of the Proposed FIFEplan LDP and will be taken into account in assessing proposals for development of sites. Minerals that are, or may be, of economic or conservation value will be protected from development which could prevent or jeopardise their extraction. Prior extraction of minerals should be facilitated and encouraged for any substantial new development sites, in line with national policy, with the aim of preventing sterilisation of minerals.

Sites (not in the Proposed FIFEplan) proposed by Objectors

Candidate site LDP-CER001 – Land to East of Ceres & Candidate site LDP-CER004 – Land at Baltilly

Ceres & District Community Council (2), Mark R D Fleming (1900), Lundin Homes Ltd (2071): The Proposed Local Development Plan allocates land for housing across the Cupar & NW Fife Housing Market Area, sufficient to meet housing land requirements. Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with under Issue 2B Homes. All sites identified for housing development in the Proposed Local Development Plan have been the subject of site assessments. It remains Fife Council’s position that candidate site LDP-CER001 should not be allocated for development at this time.

Given the information submitted through the Proposed FIFEplan consultation process however, and particularly the reduction in the size of the LDP-CER004 site, Fife Council considers that there may be merit in reconsidering the Baltilly site for inclusion in the FIFEplan for housing (19 houses) and invites the Reporter to make an appropriate recommendation on this matter.

Should the Reporter choose to look favourably on the inclusion of land at Baltilly, Fife Council considers that it would be appropriate to reconsider the allocation of CER001 (Doves Loan). The site at Baltilly is considered to be of a scale that would be sufficient to meet the local needs of Ceres over the plan period, and indeed provides a slightly higher number of houses than land at Doves Loan. It is noted that Ceres & District Community Council would support the replacement of land at Doves Loan with land at Baltilly.

The FIFEplan strategy for the Cupar and Howe of Fife Area is to avoid new development in close proximity to Cupar where this is of scale that could compete with the Cupar North Strategic Development Area. As such, Fife Council recommends that the potential for any cumulative impact on Cupar North be taken into account in the Reporter’s consideration of proposals at Doves Loan and Baltilly.
CUPAR

Cupar Issues

Cupar and North Preservation Society (2634): Where possible, when identifying locations for new housing and other uses, Fife Council considers the re-use of previously developed land before development on greenfield sites, in line with Scottish Planning Policy (2014) (CD1). In order to conform to TAYplan Strategic Development Plan requirements, however, it has been necessary to include greenfield development sites in the Local Development Plan. Further, the provision of a mix of brownfield and greenfield sites is required to provide sufficient choice for the market to deliver the developments an area needs. Proposals for the redevelopment of each of the brownfield sites mentioned in this representation are being promoted through FIFEplan.

Royal Burgh of Cupar & District Community Council (3677): support for FIFEplan position is noted.

CUP001 – Cupar North Strategic Development Area

Principle/Scale of Development

Senga Munro (88); Elizabeth Shearer (2601); Carrie Fox (803); Ceri Williams (2967); Sue Williams (2975); Lynne White (3245); Neil White (3504); Rachel White (3522); Katherine & George McQuitty (291); Roderick Gauld (237) & (1558); Ian C Copland (302); Harald Gavin (499); Henry Waters (735); John McNaughton (827); Simon Hiles (963); Peter & Wendy Baylis (1203); George Evans (1456); Anthony Fusaro (3051); Janice Martin (3119); Lynda Martin (3496); Denise Wilson (1488); CALA (2218, 2219 & 2220); Cupar and North Fife Preservation Society (2638): Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with in Issue 2B Homes.

The Cupar Strategic Development Area (SDA) proposed has been carried forward from the adopted St. Andrews and East Fife Local Plan (CD9) and is included in the TAYplan Strategic Development Plan (CD4). Work is well advanced and, whilst officers of the Council have therefore been in discussions with developers in relation to the delivery of the SDA, Fife Council retains the governance in these matters and the FIFEplan proposals reflect positions agreed by Elected Members at the various stages of Development Plan process.

The Cupar North Development Framework diagram outlines suggested land uses and an indicative development boundary consistent with Fife Structure Plan/TAYplan requirements. Refinement of this Strategic Development Area into more detailed proposals will occur through a forthcoming Masterplanning process. Development interests and adjacent or co-located landowners are urged to participate in a unified manner in reaching a satisfactory and achievable configuration of land uses, road or path networks and facilities as part of this process. The exact boundaries of the Strategic Development Area will be set by this Masterplanning process, which will also involve community engagement and consultation with key stakeholders. Masterplans prepared consistent with the Development Plan strategy will ensure the integration of new development with the existing town, minimising impact through careful siting and design. Issues of landscape setting, including potential impacts on Designed Landscapes and Scheduled Ancient Monuments, will be addressed through the...
Masterplan process, which will include extensive consultation with the local community, local elected members, statutory consultees and other interested parties.

**Landscape, Townscape, Views and Character**

Senga Munro (88); Elizabeth Shearer (2601); Carrie Fox (803); Ceri Williams (2967); Sue Williams (2975); Lynne White (3245); Neil White (3504); Rachel White (3522); Katherine & George McQuitty (291); Roderick Gauld (237, 1558); Ian C Copland (302); Harald Gavin (499); Henry Waters (735); John McNaughton (827); Simon Hiles (963); Peter & Wendy Baylis (1203); George Evans (1456); Anthony Fusaro (3051); Janice Martin (3119); Lynda Martin (3496); Denise Wilson (3522); Katherine & George McQuitty (291); Roderick Gauld (237, 1558); Ian C Copland (302); Harald Gavin (499); Henry Waters (735); John McNaughton (827); Simon Hiles (963); Peter & Wendy Baylis (1203); George Evans (1456); Anthony Fusaro (3051); Janice Martin (3119); Lynda Martin (3496); Denise Wilson (3522); Royal Burgh of Cupar & District Community Council (74, 3677): Where possible, when identifying locations for new housing and other uses, Fife Council considers the re-use of previously developed land before development on greenfield sites, in line with Scottish Planning Policy (2014) (CD1). In order to conform to TAYplan Strategic Development Plan requirements, however, it has been necessary to include greenfield development sites in the Local Development Plan. Further, the provision of a mix of brownfield and greenfield sites is required to provide sufficient choice for the market to deliver the developments an area needs.

Site assessments were conducted on all potential development sites before their inclusion in the Proposed Plan (CD15). These assessments were undertaken in accordance with Section 5(3) (a) of the Environmental Assessment (Scotland) Act 2005. The SEA Environmental Report assesses the potential significant environmental impact of implementing the policies and proposals contained within the Plan across a number of themes - this includes landscape. The Plan has therefore been assessed for the extent to which its policies protect valued landscape areas and more local features of value and how its proposals may change areas of relatively high landscape value.

The Local Development Plan anticipates that advance planting of tree belts and structure landscaping will ensure that the environmental setting of the town is protected and that new housing is sited within the mature and established surroundings.

**Transport**

Senga Munro (88); Elizabeth Shearer (2601); Carrie Fox (803); Ceri Williams (2967); Sue Williams (2975); Lynne White (3245); Neil White (3504); Rachel White (3522); Katherine & George McQuitty (291); Roderick Gauld (237, 1558); Ian C Copland (302); Harald Gavin (499); Henry Waters (735); John McNaughton (827); Simon Hiles (963); Peter & Wendy Baylis (1203); George Evans (1456); Anthony Fusaro (3051); Janice Martin (3119); Lynda Martin (3496); Denise Wilson (3522); Royal Burgh of Cupar & District Community Council (74, 3677): All transport impacts from strategic growth will be identified and appraised through completion by the developers (for Fife Council approval) of a detailed Transport Assessment. This will consider the capacity of the existing road network and identify the most suitable points for the relief road junctions as well as public transport points. The Transport Assessment will be a central part of forthcoming masterplanning and will also in due course inform and support the submission of planning applications to Fife Council by development interests.

Addressing traffic volumes through the town centre is also critical if long term environmental improvements and ‘town centre first’ planning policies within Cupar are to be successful. Accordingly Fife Council has developed and maintained an accurate
understanding of traffic levels and flows within Cupar since initial traffic modelling in 2004. That data includes existing routes within the town centre, further assessment on which will occur as developers prepare comprehensive transport assessments to support and accompany forthcoming masterplans and planning applications.

The recent road improvements carried out in Cupar have improved traffic flow through the town, particularly at the St. Catherine Street /Station Road junction. This means that it is no longer necessary for the relief road to be operational prior to any development starting within the SDA however as construction takes place within the SDA the spare traffic capacity within the town centre, created by the recent works, will reduce. As such the provision of relief road timeously by developers remains an effective long term solution achieving growth and benefits for the town.

Economy

Senga Munro (88); Elizabeth Shearer (2601); Dr Carrie Fox (803); Ceri Williams (2967); Sue Williams (2975); Lynne White (3245); Neil White (3504); Rachel White (3522); Katherine & George McQuitty (291); Roderick Gauld (237, 1558); Ian C Copland (302); Harald Gavin (499); Henry Waters (735); John McNaughton (827); Simon Hiles (963); Peter & Wendy Baylis (1203); George Evans (1456); Anthony Fusaro (3051); Janice Martin (3119); Lynda Martin (3496); Denise Wilson (1488): Employment provision remains a priority for Fife Council and is an integral part of the Development Plan. This is evidenced by the inclusion within Cupar North of land for a small business park, bulky goods retail area in addition to serviced employment land providing within the development area, space for general industry or storage and distribution uses. The Local Development Plan will be informed by an Employment Land Strategy (CD18) which will determine the size and nature of employment land or infrastructure necessary to attract jobs and inward investment.

New employment land allocations in the Local Plan are intended to support the local economy. As well as attracting new employers to the area, the creation of new enterprises and stimulating investment by developers of business premises, this also provides for the expansion or relocation of existing businesses. Any detrimental impacts such as noise or odour are an operational matter for end-users and are subject to detailed consideration at time of the planning application.

Infrastructure and Services

Senga Munro (88); Elizabeth Shearer (2601); Dr Carrie Fox (803); Ceri Williams (2967); Sue Williams (2975); Lynne White (3245); Neil White (3504); Rachel White (3522); Katherine & George McQuitty (291); Roderick Gauld (237, 1558); Ian C Copland (302); Harald Gavin (499); Henry Waters (735); John McNaughton (827); Simon Hiles (963); Peter & Wendy Baylis (1203); George Evans (1456); Anthony Fusaro (3051); Janice Martin (3119); Lynda Martin (3496); Denise Wilson (1488); Royal Burgh of Cupar & District Community Council (74, 3677); National Health Service Fife (3842): Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife, Scottish Environment Protection Agency and Scottish Water, have been consulted throughout the Development Planning process. Where potential deficiencies in infrastructure have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision. Detailed matters, such as the specifications of road access, Flood Risk Assessment and
drainage arrangements for example, are dealt with at planning application stage.

Primary healthcare facilities include GP surgeries and are managed locally by NHS Fife. In this respect NHS Fife are involved in the preparation of the Development Plan including to date, proposals for strategic growth in Cupar. NHS Fife confirm that investing in current healthcare facilities and investing in new buildings to enable and facilitate the new models of care and service delivery are central priorities within the NHS Fife Property Asset Management Strategy prepared in June 2013 (SD6). Adamson Hospital will cope in the short to medium term and any long term requirements will be discussed as the details of the Cupar North proposal progress. Land has been safeguarded in this respect within Cupar North to ensure that if an additional primary healthcare facility is required it can be accommodated and built in conjunction with future development.

Proposals for the strategic growth of Cupar have been developed in conjunction with colleagues in Fife Council Education and Learning Directorate. At this time, it is anticipated that an extension to Bell Baxter Secondary School will be required and that planning obligations will accordingly be sought from forthcoming development to assist in funding this.

Environment

Senga Munro (88); Elizabeth Shearer (2601); Carrie Fox (803); Ceri Williams (2967); Sue Williams (2975); Lynne White (3245); Neil White (3504); Rachel White (3522); Katherine & George McQuitty (291); Roderick Gauld (237, 1558); Ian C Copland (302); Harald Gavin (499); Henry Waters (735); John McNaughton (827); Simon Hiles (963); Peter & Wendy Baylis (1203); George Evans (1456); Anthony Fusaro (3051); Janice Martin (3119); Lynda Martin (3496); Denise Wilson (1488) - Strategic growth such as that proposed within Cupar North will necessitate the provision of convenience retail/services within the development area, located and appropriately arranged through masterplanning. In this respect unnecessary trips particularly by car should be discouraged reducing the reliance on cross town movement and in turn traffic congestion/pollution. All transport impacts from strategic growth will be identified and appraised through completion by the developers of a detailed Transport Assessment (for Fife Council approval). This will consider the capacity of the existing road network and identify the most suitable points for the relief road junctions as well as public transport points. The Transport Assessment will be a central part of forthcoming masterplanning and will also in due course inform and support the submission of planning applications to Fife Council by development interests.

The Masterplan to be prepared, consistent with the Development Plan strategy, will ensure the integration of new development with the existing structures and access arrangements on site, minimising impact through careful siting and design. Issues relating to the amenity of existing residents such as noise, nuisance, smell, privacy, daylight etc. would be addressed at the detailed planning application stage. In this event, separate Local Development Plan policies on amenity (Policy 10) will help to protect existing amenity and assist the decision making process on planning applications.

The use of alternate sites to south has been discussed under Landscape, Townscape, Views and Character above.
Miscellaneous Issues

Senga Munro (88); Elizabeth Shearer (2601); Carrie Fox (803); Ceri Williams (2967); Sue Williams (2975); Lynne White (3245); Neil White (3504); Rachel White (3522); Katherine & George McQuitty (291); Roderick Gauld (237, 1558); Ian C Copland (302); Harald Gavin (499); Henry Waters (735); John McNaughton (827); Simon Hiles (963); Peter & Wendy Baylis (1203); George Evans (1456); Anthony Fusaro (3051); Janice Martin (3119); Lynda Martin (3496); Denise Wilson (1488); Cupar Community Groups (2499); Cupar and North Fife Preservation Society (2638): Cupar North is an established strategic allocation having been contained within strategic planning documents since 2005. Regular and distinct stages of public consultation have occurred on the Fife Development Plan. This includes scrutiny and approval of the former Fife Structure Plan by Scottish Ministers (2009), examination of the St Andrews & East Fife Local Plan (2012), examination and approval of TAYplan Strategic Development Plan (2011/12) and most recently public consultation on FIFEplan Proposed Plan (2014). Cupar North SDA has been an established proposal throughout and continues to be central to the development strategy for Fife.

Strategic growth in Cupar North has attracted a wide range of public opinion with numerous stakeholder exhibitions, public meetings and events conducted by Fife Council and partner authorities to promote, explain and publicise the project. At all times the project has been led and project-managed by Council planners ensuring continuity for Community groups, stakeholder interests and Fife Council elected members.

The issue of land ownership shall be examined during the masterplanning process.

Funding/Legal Agreements

Royal Burgh of Cupar & District Community Council (74, 3677); D B M Rollo (616): In considering proposals for major growth, Fife Council must be satisfied that the proposal made is deliverable and that no undue burden will be placed on the public purse. In this respect it is normal practice for all major planning applications to be accompanied by a form of legal agreement securing the grant of planning permission to the land, not to the individual developer/s in question. In this respect it is also common for guarantees by way of bonds or similar to be requested ensuring that the provision of major infrastructure such as a relief road is not left unfinished. A definitive approach will be agreed in considering the forthcoming planning applications.

The Council’s Executive Committee on 23 June 2015, discussed the deliverability of the Relief Road and agreed that the following words in Page 57 of the proposed Local Development Plan relating to the current description of the Relief Road be removed:-

“Fund and construct relief road in a phased manner as housing development progresses, including junctions at A91. Funding and delivery to be secured via legal agreement.”

To be replaced by:-

“The Cupar North Consortium will be responsible for the funding and construction of the associated relief road including junctions at A91. Said relief road to be completed no later than 5 years after the completion of the first house by the Cupar North Consortium. It should also be noted that this was the proposal that was put to Fife Council/Fife
Councillors and more importantly to the community of Cupar when this development was first brought forward some 9 years ago, and subsequently included in the then Fife Structure Plan and thereafter subsequent plans."

Fife Council considers this matter should be explored further and invites the Reporter to make an appropriate recommendation on this issue.

CUP002 – St.Columba’s, CUP003 – Kirk Wynd & CUP004 – Provost Wynd

Royal Burgh of Cupar & District Community Council (3677): Comments noted.

CUP005 – Former Granary Site, Station Road

Royal Burgh of Cupar & District Community Council (3677): Comments noted.

Scottish Environment Protection Agency (3252): Fife Council considers that there is merit in the Scottish Environment Protection Agency’s request for expansion of the developer requirements to specify the need for a flood risk assessment and ensure that no built development takes place on the functional flood plain, and invites the Reporter to make an appropriate recommendation on this matter.

CUP006 – Former ATS Depot, St.Catherine Street/Station Road

Cupar and North Fife Preservation Society (2639); John Clark (131); John Topliiss (823); Royal Burgh of Cupar & District Community Council (1009); Alison Scott (1477); Michael O’Gorman (2187); Cupar Community Groups (2502); Janice Martin (3123); David W L Smith (3437); Peter Davidson (3440); Janet Wilson (3426); Ian Jones (3430); Helen Terwey (3434); Maureen Waters (3441); H Waters (3443): FIFEplan proposal CUP006 was framed in the context of an existing development brief that was agreed by North East Fife Area Committee in March 2011 (see Supporting Document SD3). However, since the former ATS building was demolished, a body of local opinion has emerged which seeks to retain the current open aspect of the site on the basis that it represents an improvement upon what the existing development brief for the site proposes.

Following targeted consultation with the local Cupar public on this matter as part of the overall FIFEplan consultation process, there appears to be a degree of consensus amongst those who responded that Cupar would benefit from a partial redevelopment, which would maintain much of the present open aspect of the site. On this basis it is proposed to amend the planning brief for the site and brief Members separately. This being the case, Fife Council considers that there is merit in the majority view of respondents that FIFEplan proposal CUP006 should reflect a partial redevelopment of the site, in line with a new development brief to be prepared by Fife Council, and invites the Reporter to make an appropriate recommendation on this matter.

CUP007 – Moathill Site

Royal Burgh of Cupar & District Community Council (3677): Fife Council considers the Proposed FIFEplan allocation for this site to be appropriate.

CUP008 – Bonnygate Gap Site

Royal Burgh of Cupar & District Community Council (3677): Support for FIFEplan
CUP009 – Prestonhall East

SEPA (3349): A Flood Risk Assessment is one of the stated Developer Requirements for this site. Support for the FIFEplan position is noted.

Sites (not in the Proposed FIFEplan) proposed by Objectors

Candidate Sites LDP-CUP001 - Ferryfield, Brighton Road, LDP-CUP003 – Tarvit Farm, Pittscottie Road and LDP-CUP004 – Land at South Road

CALA (2218, 2219, 2220); Campion Homes (2951); C Addison-Scott (1280); Thomas Candlish (1548, 1571); R Gilchrist (3060): The Proposed Local Development Plan allocates land for housing across the Cupar & NW Fife Housing Market Area, sufficient to meet housing land requirements.

Issues relating to the housing land requirement and the provision of an effective housing land supply (including the allocation of residential development sites additional to the Cupar Strategic Development Area) are dealt with under Issue 2B Homes. All sites identified for housing development in the Proposed Local Development Plan have been the subject of site assessments. At this time, there is no need to allocate, for housing, any of the sites which are the subject of these representations. It therefore remains Fife Council’s position that candidate sites LDP-CUP001, LDP-CUP003 and LDP-CUP004 should not be allocated for development at this time.

CUPAR MUIR

Cupar Muir Issues

Cupar and North Preservation Society (2635): Where possible, when identifying locations for new housing and other uses, Fife Council considers the re-use of previously developed land before development on greenfield sites, in line with Scottish Planning Policy (2014) (CD1). In order to conform to TAYplan Strategic Development Plan requirements (CD4), however, it has been necessary to include greenfield development sites in the Local Development Plan. Further, the provision of a mix of brownfield and greenfield sites is required to provide sufficient choice for the market to deliver the developments an area needs.

CPM001 – Sawmill

Rent a Skip (90): Support for FIFEplan position is noted.

Sites (not in the Proposed FIFEplan) proposed by Objectors

Neil Munro (689): Planning permission in principle was granted in 2013 (13/02401/PPP) for the development of affordable housing (renewal of planning permission 10/01108/PPP) (see SD7, SD8 and SD9). Fife Council therefore considers that there is merit in the adjustment of the Cupar Muir settlement boundary to include land at the former walled garden site and invites the Reporter to make an appropriate recommendation on this issue.
DAIRSIE

DAI001 – South of Osnaburgh Court

Ian Byers (609, 1683); David Mooney (1073); Alastair Dawson and Yvonne Wardrope (3736): Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with Issue 2B Homes. Dairsie has a limited range of services and this allocation will provide an opportunity for small scale housing development to cater for a local market and will complement the existing allocation in the St Andrews & East Fife Local Plan (CD9). The site will integrate well with the existing village, with multiple access points into the site possible, although this may require road improvements. Sensitive development will overcome landscape issues related to the site.

Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife, and Scottish Water, have been consulted throughout the Development Planning process. Where potential deficiencies in infrastructure have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision. In relation to this site specifically, Fife Council's Transportation Services have raised no concerns to the site's allocation in principle. Detailed matters, such as the specifications of road access and drainage arrangements for example, are dealt with at planning application stage.

Site plan to be prepared consistent with the Development Plan strategy to ensure the integration of new development with the existing village, minimising impact through careful siting and design. Low density housing will reflect the rural setting with site design and layout to be drafted with consideration for existing residential amenity. Whilst loss of individual private views is not a material planning consideration, the Local Plan recognises the importance generally of views out from Osnaburgh Court and issues related to protection of visual amenity are dealt with at planning application stage. Loss of property values is not a material planning consideration.

PEAT INN

Tim Esparon (134): The settlement boundary for Peat Inn in the Proposed Local Development Plan is unchanged from that in the adopted St Andrews and East Fife Local Plan (2012) (CD9). The Proposed Local Development Plan allocates land for housing across the Cupar & NW Fife Housing Market Area, sufficient to meet housing land requirements. Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with in Issue 2B Homes. All sites identified for housing development in the Proposed Local Development Plan have been the subject of site assessments. At this time, there is no need to allocate, for housing, any of the sites which are the subject of these representations.

PITSCOTTIE

Sites (not in the Proposed FIFEplan) proposed by Objectors

Candidate Site LDP-PIS001 – Cupar Road

Richmond Homes (2076): The Proposed Local Development Plan allocates land for
housing across the Cupar & NW Fife Housing Market Area, sufficient to meet housing land requirements. Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with in Issue 2B Homes. All sites identified for housing development in the Proposed Local Development Plan have been the subject of site assessments. At this time, there is no need to allocate, for housing, any of the sites which are the subject of these representations.

SPRINGFIELD

SPF002 – East of Crawford Park

Laura Simpson (121); Lynne Rice (127); Andrew Budge (383); Donald Ellis (1471); Louise Davidson (3721):

Principle of Development/ Scale and Location

Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with Issue 2B Homes. The proposed site is already allocated in the adopted St. Andrews and East Fife Local Plan. Fife Council has a requirement to maintain at least a 5 year effective housing land supply in the Cupar & NW Fife Housing Market Area, and the Local Plan should identify sufficient sites to meet the housing land requirement for 10 years. Allocating a sufficiency of land for housing across the Housing Market Area in the Local Plan gives the flexibility necessary for the continued delivery of new housing should unpredictable changes to the effective housing land supply occur during the lifetime of the Local Plan. SPF 02 contributes 50 houses to the housing land supply.

Landscape, Townscape, Views and Character/Environment

Site assessments were conducted on all potential development sites before their inclusion in the Proposed Plan (CD15). These assessments were undertaken in accordance with Section 5(3) (a) of the Environmental Assessment (Scotland) Act 2005. The SEA Environmental Report assesses the potential significant environmental impact of implementing the policies and proposals contained within the Plan across a number of themes - this includes landscape. The Plan has therefore been assessed for the extent to which its policies protect valued landscape areas and more local features of value and how its proposals may change areas of relatively high landscape value.

Issues relating to the residential amenity of existing residents such as noise, privacy, daylight etc. would be addressed at the detailed planning application stage. In this event, separate Local Development Plan policies on amenity (Policy 10) will help to protect existing amenity and assist the decision making process on planning applications.

Economy

The Fife Employment Land Strategy (FELS) (CD18) approved by Fife Council in 2014 complements FIFEplan, ensuring that Fife maintains adequate employment land across key settlements. It provides additional detail on employment sites including use classes.
Transport/Infrastructure and Services

Council Services such as Transportation, Housing Services and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the Development Planning process. Where potential deficiencies in infrastructure have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision. Detailed matters, such as the specifications of road access and site layout for example, are dealt with at planning application stage.

Housing/Affordable Housing Issues

In order to achieve mixed and balanced communities, mixed tenure developments will be promoted: for example, private, social rented housing, shared equity housing and low cost housing for sale. In line with Local Development Plan Policy 2: Homes, at least 20% of any new housing development in Springfield will be affordable housing.

Sites (not in the Proposed FIFEplan) proposed by Objectors

Candidate Site LDP-SPF001- Land to the South of Springfield

George Adamson (1); Rachel McGregor (81); Norma Gibson (179); Hugh SATENON (2633); Malcolm Dick (2637); S Colligan (2640); Amanda McKenzie (2641); Rob Hall (2642); Shaun Allison (2643); Mr & Mrs Neville (2649); S Stock (2654); Shelley Styles (2657); Nicholas Styles (2658); Bruce Lowden (2660); Michelle Smith (2661); Iain Boylan (2662); Ian Wheeler (2663); Evan Davidson (2665); Mhairy Anton (2669); Mr & Mrs Allan (2671); L Anton (2673); Ken Anton (2675); Calum McKenzie (2678); George Adamson (2687); Rachel McGregor (2690); Caroline Campbell (2706); Philip Gibson (2680); Rosemary Graham (2681); Sean Ledder (2682); James Murray (2685); Irene Dalrymple (2696); E Adams (2708); Norma Gibson (3789); Hilda Begg (2651); Colin Petrie (3379); J.G.Lang & Son (2191, 2189, 2185); Andrew Simmers (2652); Stewart Gray (2659); Springfield Community Council (3446): The Proposed Local Development Plan allocates land for housing across the Cupar & NW Fife Housing Market Area, sufficient to meet housing land requirements.

Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with in Issue 2B Homes Schedule 4 (2B). All sites identified for housing development in the Proposed Local Development Plan have been the subject of site assessments. At this time, there is no need to allocate, for housing, candidate site LDP–SPF001.

COUNTRYSIDE AREAS

LWD005 – Russell Mains, Springfield

SEPA (3562): Support for FIFEplan position is noted.
Reporter's conclusions:

CERES

Site CER 001 Doves Loan

1. The site is allocated for residential development with an estimated capacity of 12 houses. Sharply sloping ground extends upwards from the houses that form the current boundary of Ceres.

2. As has been pointed out, planning permission for residential development was refused some years ago.

3. Although, to some extent, I agree with the council’s opinion that local topography would reduce the wider landscape impact of development on the site, I do not consider that the extended settlement boundary would represent the natural or organic growth of Ceres. Housing on the site would not relate well to existing development to the northwest. The higher level of the site would lead to a significant degree of local domination. The proposed access would have the advantage of providing a local road improvement but I do not consider that this benefit outweighs the degree of separation that would result from the lack of a clear relationship with existing development.

4. All-in-all, having noted the representations, I am concerned about the designation of site CER 001 for residential development. Indeed, on reflection, the council has indicated that the allocation should be reconsidered. Accordingly, I conclude that the allocation should be deleted from the proposed plan. The land should be included within the local landscape area and the settlement boundary adjusted accordingly.

5. This conclusion also takes into account my examination of candidate site LDP-CER004 below.

Candidate Site LDP-CER001 Land to the East of Ceres

6. This site of some seven hectares adjoins the eastern boundary of Ceres. The land is agricultural and is designated within the local landscape area. The thrust of the argument to justify the allocation of this land for housing is of a strategic nature. It is claimed that the heavy dependence on the North Cupar Strategic Development Area will inevitably lead to a shortfall in delivery and that, to compensate, further housing land should be allocated.

7. The examination has found there is a shortfall in meeting the housing land requirement in the SESplan area of Fife together with the uncertainties expressed with regard to the level of that shortfall under Issue 2(b) Homes. However, the conclusions find that adequate housing land has been provided in the TAYplan area, within which the site is located, in line with the requirements set out in the strategic development plan. In addition, the 2015 Housing Land Audit has found that there is a 5-year effective housing land supply in both the Cupar and North West Fife and St Andrews and North East Fife Housing Market Areas. Accordingly, there is no strategic numerical justification to allocate further sites for housing within the TAYplan area.

8. In accordance with the foregoing conclusion, I accept the council contention that
adequate provision for housing in the Cupar and North West Fife Housing Market Area is contained in the proposed plan with no requirement for further allocations. Despite the concern expressed about the capability of the North Cupar site allocation to deliver the requisite number of new houses, I have concluded that the site should be retained within the proposed plan (see Site CUP 001 below).

9. Little detailed justification has been provided for the allocation of site LDP-CER001 other than the land is fully effective in terms of the criteria set out in Planning Advice Note 2/2010, Affordable Housing and Housing Land Audits. The site is said to be preferable to the proposed site at Doves Loan.

10. It will be noted that the deletion of the site at Doves Loan is recommended (see Site CER 001 above) along with the allocation of land at Baltilly for residential purposes with an estimated capacity of 19 houses (see Site LDP-CER004 below). I believe that the scale of the site at Baltilly to be appropriate for Ceres when set in the context of the wider housing land strategy. In itself, this points towards site LDP-CER001 remaining unallocated within the local landscape area beyond the Ceres settlement boundary.

11. In my opinion, the scale of the development area would be likely to have an impact on the character of Ceres particularly as it has not been made clear how the proposed housing would integrate with the village. I note the council’s site assessment also refers to this problem along with flooding incidents, impact on cultural heritage sites and general landscape impact. On this basis, I do not believe that housing would be the most appropriate land use for the site and, in turn, the proposal fails the effectiveness test.

12. Overall, I conclude that the allocation of site LDP-CER001 for housing is not justified and the land should remain within the local landscape area beyond the settlement boundary of Ceres.

Candidate Site LDP-CER004 Land at Baltilly

13. The site extends to approximately two hectares and is designated as part of a local landscape area within the proposed plan. Part of the eastern boundary of the site adjoins the Ceres settlement boundary. The site is relatively flat and falls gently to the southern boundary formed by the B939. The council had originally opposed the allocation of the site for housing believing that the development would not connect well with the village. However, on reflection, and considering also the proposed allocation at Doves Loan (see Site CER 001 above), the council now believes there is merit in the allocation of the land at Baltilly for 19 houses.

14. I have concluded that the site at Doves Loan should not be allocated as housing land. Whilst there is not a strategic need for further residential development at Ceres, I accept that a relatively small-scale development in the village would complement the strategy to support the Cupar Strategic Development Area. The indicative plan submitted as part of the justification for the allocation of site LDP-CER001 shows a layout of 19 houses. I believe this is the scale of development that would be suitable for Ceres.

15. To some extent, the development of the land at Baltilly would represent a degree of isolation from the rest of the village. The indicative layout shows an enclave of development within a green landscape served by an access from the B939 having little
direct relationship with the existing built form of Ceres. However, I accept the argument that the development site is relatively close to the centre of the village – most certainly within easy walking distance. The location of the proposal is opposite existing houses to the south of the B939. I therefore agree that these considerations overcome any sense of isolation that might be attributed to the site. I also accept that the development of the site could be accommodated without a significant impact on either the local landscape area or the landscape setting of Ceres.

16. No physical constraints are apparent. Flooding impact contained in the council’s site assessment referred to part of a wider site originally proposed but subsequently reduced in size and no longer part of the current proposal.

17. Overall, I conclude that it would be appropriate to allocate the site for residential development with an estimated capacity of 19 houses. As a consequence, the local landscape area designation should be deleted and the settlement boundary extended to incorporate the site.

CUPAR

Development Priorities

18. I share the opinion of The Cupar and North Fife Preservation Society that brownfield land and derelict sites within Cupar should be regarded as priorities for redevelopment. Clearly, early action would lead to improvements in the townscape of Cupar. As the council explains, the sites specified by the Preservation Society are identified in the proposed plan. I have considered these sites below but, in general terms, I do not consider that the proposed plan requires any change in respect of this representation. Of course, this does not prevent the council using statutory powers where considered appropriate.

Site CUP 001 Cupar North Strategic Development Area

19. Cupar North is identified as a strategic development area in TAYplan. Cupar itself is described as a “Tier 2” settlement with the potential to make a major contribution to the regional economy. In terms of development, TAYplan indicates that Cupar North will accommodate 1400 houses and 10 hectares of employment land.

20. The Cupar North allocation in the proposed plan has been brought forward from the current local plan although the development concept dates from 2005. The site extends to 113.7 hectares and sweeps around the northwest and northern peripheries of the town. Various land uses are shown in the indicative framework drawing including housing (with an estimated capacity of 1400, reflecting TAYplan), employment (with provision for bulky goods retailing), a community facility, primary school, green space and a peripheral transport corridor to allow the construction of a relief road from the west to the east of Cupar.

21. The Spatial Strategy of the proposed plan confirms that Cupar North Strategic Development Area is an established strategic proposal (page 16, paragraph 54). The settlement plan sets out the development details and states that master planning, including phasing, and consultation arrangements require to be approved by the council in advance.
22. When a development plan is due to be replaced, there is the opportunity to review policies and land use allocations. In undertaking this process it is necessary to take account of representations received. Numerous representations have been submitted in this instance objecting to the principle of the proposal. It is believed that the scale of the proposed development would lead to the character of Cupar being significantly and adversely altered.

23. As explained, in development plan terms, the Cupar North proposals have been firmly established for some time. Significantly, TAYplan, the strategic development plan, with which the local development plan must be consistent, is explicit in the allocation of land at Cupar North to meet the identified housing target. As indicated, and as it must, the current local plan reflects the terms of TAYplan.

24. The proposal was also examined during the preparation of the current local plan when the basis of the housing allocation and the underlying reasons for concentrating development at Cupar North were subject to scrutiny. The examination considered both the need for expansion of the scale proposed and the infrastructure implications. It was concluded that the proposal was justified and should remain in the local plan.

25. The loss of prime agricultural land is of concern to some of those making representations. Much of the development site is land which falls within this category and development would constitute an irreversible loss. The council has explained that the scale of housing land required to meet strategic requirements is such that there is an inevitable need for some greenfield sites including prime quality land. I recognise the tensions created in these circumstances and, on balance, I conclude that in this instance the allocation of prime quality agricultural land is justified.

26. In my experience, a project of this size and complexity is likely to move forward relatively slowly at the outset. Nevertheless, progress has continued involving the Cupar North Consortium and the council along with other stakeholders. The council has pointed out that consultation has been undertaken as part of the process.

27. Most recently, an application for planning permission in principle has been submitted by the Cupar North Consortium, the application site extending over the vast majority of the area of site CUP 001. The intended land uses include housing (of which 20% would be affordable housing), commercial (bulky goods, business, hotel, restaurant, associated hot food, petrol filling station and leisure), primary school, open space and a relief road. To support the application an environmental statement has been prepared along with assessments of transport, landscape and visual impact, sustainability and services. There is also a masterplan framework report. It has been indicated by the Consortium that house construction is now intended to start in 2017.

28. I believe the submission of the planning application in principle along with the substantial work undertaken in support of the proposal demonstrates a high level of commitment to the project. Clearly, the submission of a planning application does not guarantee that permission will be granted: that is a matter for the council to consider. Even the granting of planning permission in principle should not lead to the assumption that implementation will follow in due course. However, the submission of the application is a positive indication that the development process remains underway.

29. The prospect of a development framework and an approved master plan derived from the application for planning permission in principle is to be anticipated. As
indicated in the proposed plan, the master planning process requires to be approved by the council. This will include phasing and, in turn, should allow the council to regulate the rate of development to ensure that impacts on the built and social fabric of Cupar are capable of absorption.

30. In the circumstances, particularly taking into account the terms of TAYplan, and the assessment of the project undertaken at the previous local plan examination, I conclude that, as a matter of principle, the deletion of site CUP 001 from the proposed plan would not be justified.

31. In reaching this conclusion I have taken account of the various concerns expressed including the “Town Centres First” policy, the TAYplan policies in terms of the scale of development, and access to markets, jobs, services and facilities, the guidance of the European Landscape Convention, housing policies including the provision of affordable housing and the status and potential of Dundee. It is necessary to apply a balanced approach and, as in the case of the loss of prime agricultural land, I do not consider that the various policy considerations merit the deletion of the Cupar North designation.

32. The council is not promoting the Cupar North development as a simple exercise in land use planning. It is clear from the response to the representations that a wider, co-ordinated approach has been adopted. I believe this to be essential in a project of this scale and complexity.

33. The council recognises the potential significant impact in terms of landscape character and I would not challenge the opinion that large scale development to the north of the town will, to some extent, change the physical character of Cupar and the associated landscape setting. However, the impact has been considered under the terms of the environmental assessment and mitigation is envisaged in the form of advance planting of tree belts and structural landscaping. Again I am of the opinion that, on balance, the proposed development allocation is justified.

34. Similarly, the council is aware of the importance of ensuring that infrastructure and services are provided to support new development. These considerations include educational facilities, health care, community services, transport links, water supply and drainage. I am confident that the liaison that has clearly been undertaken already will continue and that co-ordination between ongoing development and the provision of supporting services and infrastructure can be achieved. Indeed, the submission of the application for planning permission in principle has led to further formal consultation. Clearly, the service and infrastructure providers remain involved in the development process.

35. In this latter respect I have noted the response of the Scottish Environment Protection Agency. This aspect of the proposal has also given rise to some ongoing third party concern. However, the Agency does not object to the proposal but, in the event of approval, requires a condition “to protect people and the environment from the impact of waste water and ensure that the development can be serviced by the public waste water sewerage scheme”. It is clear that major drainage works will be required but I believe this would be expected in any development of this scale. The financial and practical implications of undertaking the necessary improvements are for the stakeholders to consider but I have been provided with no clear reason why the installation of drainage infrastructure should represent an overwhelming constraint.
36. I can appreciate the difficulty of forecasting the economic benefits of a mixed-use development of the scale proposed. Nevertheless, I have noted the council’s response in this respect and note the role of the Employment Land Strategy. Whilst employment potential projections would be helpful, I do not believe that this issue justifies the deletion of site CUP 001.

37. Turning to more detailed comments, I note the concern about development in the proximity of the Adamson Hospital and Dental Unit. The proposed plan states that non-compatible uses will not be permitted to encroach on existing health care facilities. This provides adequate safeguarding for the facilities in the proximity of the development area. On this basis, no modification is required.

38. A small part of land to the rear of 19 Back Lebanon is shown within site CUP 001 although this is private land within the curtilage of the house. The site allocation should be removed from this area of land.

39. The Cupar North Consortium is concerned about an early start to development at Gilliesfaulds West which is within the Cupar North Strategic Development Area but is not within the control of the Consortium. It is believed by the Consortium that new houses on the site, which has a capacity of 168 units, could delay the wider development because of restricted marketing capability. On the other hand, the council does not consider it appropriate to restrict the delivery of houses on the site as all the land within the CUP 001 allocation should contribute to the effective housing land supply. In any event, the council has confirmed that the Gilliesfaulds West development will require to contribute to the construction of the relief road.

40. It would be unfortunate if the wider project were to be delayed but, as indicated, it is clear that the Consortium has made very significant progress towards implementation. It had been anticipated initially that houses would be occupied in early 2016. Whilst this target has not been achieved, as explained above, house construction is now planned for 2017. It therefore appears possible that development by the Consortium may precede that at Gilliesfaulds West where I note a planning application notice has been approved but have no information about a subsequent formal application. In any event, in the determination of any planning application for development at Gilliesfaulds West, the council would have the ability, if required, to control phasing. Similarly, any planning permission could be subject to planning obligations, for instance, to ensure the provision of infrastructure.

41. On the foregoing basis, I am not persuaded that a start at Gilliesfaulds West would represent a significant threat to the wider development. It appears from the examination of Issue 2b, Homes, that market conditions are improving and, as often argued by house builders, a range of sites has the advantage of offering prospective purchasers a choice. All-in-all, I consider that the proposed plan is acceptable in terms of the reference to Gilliesfaulds West and that a change would not be justified.

42. In response to representations requiring confirmation that the construction of the relief road will be phased to service housing development, the council has suggested a modification to indicate that the Cupar North Consortium will be responsible for the funding and construction of the relief road. I note from representation 1365 that the Cupar North Consortium (also referred to as the “Partnership”), comprising Persimmon Homes, Headon Developments and Vico Properties, has control of the land required to deliver the relief road. I believe the proposed plan should describe the role of this group
and simply indicate the basis on which it has responsibility for constructing the road.

43. Although the overall construction of the road within five years of the completion of the first house is required by the council, I have no indication of the basis for requiring this timescale or whether or not the time allowed is reasonable. Indeed, the Consortium has argued that this timescale is arbitrary and unjustified. The Consortium believes that it would be reasonable to require the completion of the relief road by the time of the occupation of the 600th house.

44. Whilst I can appreciate the desire of the council to ensure the completion of the relief road at the earliest possible date, I believe the case put by the Consortium is persuasive. In particular, I note the application for planning permission in principle is supported by a Transport Assessment which examines traffic generation in detail. The Consortium considers that the anticipated building rates would result in the completion of the relief road approximately eight years after the completion of the first house. This would be less than half way through the wider development project. Therefore accept that this would be a more appropriate approach to the provision of the relief road.

45. Other matters of detail including references to noise and light pollution, construction techniques and drainage design are issues that are best addressed by the council through its development management function at the time of detailed planning proposals. Similarly, residential amenity and privacy are matters to be dealt with when a detailed layout comes forward although loss of a view is not normally a planning consideration.

46. The suggestion that Cupar North Strategic Development Area should be altered to become the Cupar Strategic Development Area and include additional allocations such as land at Ferryfield is not accepted. This is dealt with under examination of Candidate Site LDP-CUP001 Ferryfield, Brighton Road (see below).

Site COP 002 St Columba’s

47. This town centre land would clearly benefit from redevelopment and I believe the proposed plan correctly identifies the site as a housing opportunity.

48. The Cupar and North Fife Preservation Society requires the council to “take active measures” to secure the implementation of the development of the site. I accept that early development would be welcome. However, I do not regard this as a matter for inclusion in the proposed plan which should remain unaltered in this respect.

Site COP 003 Kirk Wynd

49. The identification of the land as an opportunity site is not disputed and I agree that this is an appropriate allocation. The community council would prefer the site to be used for the provision of affordable housing and again I accept that this would a compatible use. However, the recognition in the proposed plan that the site has the potential to contribute to the housing land supply is justified and provides wider scope for the required redevelopment. I do not anticipate the housing allocation would be an inhibiting factor should a scheme involving affordable housing be brought forward.

50. The community council also wishes the council to assist in bringing redevelopment to fruition. Whilst early development of the site would be beneficial I do not regard this
as a matter for inclusion in the proposed plan which should remain unaltered in this respect.

Site CUP 004 Provost Wynd, Former Leuchars Removals

51. Again, the identification of the land as an opportunity site is not disputed and I agree that this is an appropriate allocation. Once more, the community council would prefer the site to be used for the provision of affordable housing and I accept that this would a compatible use. However, as explained, the recognition in the proposed plan that the site has the potential to contribute to the housing land supply is justified and provides wider scope for the required redevelopment. The housing allocation would not be an inhibiting factor should a scheme involving affordable housing be brought forward.

52. The community council again wishes the council to assist in bringing redevelopment to fruition. Whilst early development of the site would be welcome I do not regard this as a matter for inclusion in the proposed plan which should remain unaltered in this respect.

Site CUP 005 Former Granary Site Station Road

53. The Scottish Environment Protection Agency has set out a reasoned justification for including a requirement for a flood risk assessment. Scottish Planning Policy says that the planning system should prevent development which would have a significant probability of being affected by flooding or which would increase the probability of flooding elsewhere. To ensure this objective, I believe the council is correct to recognise the merit of this suggestion and the proposed plan should be altered accordingly.

Site CUP 006 Former ATS Depot, St Catherine Street / East Bridge

54. This is a site where the Cupar and North Fife Preservation Society requires the council to “take active measures” to secure the implementation of the development of the site. Again I accept that early development would be welcome and it appears that the council is indeed actively involved in the future of the site. However, I do not regard this as a matter for inclusion in the proposed plan which should remain unaltered in this respect.

55. Although it has been suggested that the site would be better suited to use as a civic open space, I note that limited building has also been suggested. On reflection, the council supports a design involving partial redevelopment and I agree that a solution including an element of building would be more appropriate.

56. Care would be required in respect of the surrounding “townscape” but I consider that some building on the site could provide an attractive feature at the entrance to the town centre whereas open space in total would have less of a visual impact. As suggested by the council, I accept the proposed plan should be altered to reflect the current approach to the future of the site.

Site CUP 007 Moathill Site

57. Although the community council would prefer the site to remain as a green space no details have been provided to justify the need for greenspace or to support the
particular purpose of such an area. In my opinion, the location provides a typical town centre infill opportunity where built development would improve the existing “townscape.” On this basis, I believe the site requirements set out in the proposed plan are correct and retention for green space is not justified.

Site CUP 008 Bonnygate Gap Site, Bonnygate

58. Once more, the Cupar and North Fife Preservation Society requires the council to “take active measures” to secure the implementation of the development of the site. As above, I accept that early development would be welcome. A development brief has been approved and it appears that the council is indeed actively involved in the future of the site. However, I do not regard this as a matter for inclusion in the proposed plan which should remain unaltered in this respect.

Candidate Site LDP-CUP001 Ferryfield, Brighton Road

59. I acknowledge that there is a shortfall in meeting the housing land requirement in the SESplan area of Fife together with the uncertainties expressed with regard to the level of that shortfall under Issue 2(b) Homes. However, the conclusions find that adequate housing land has been provided in the TAYplan area in line with the requirements set out in the strategic development plan. In addition, the 2015 Housing Land Audit has found that there is a 5-year effective housing land supply in both the Cupar and North West Fife and St Andrews and North East Fife Housing Market Areas. Accordingly, there is no strategic numerical justification to allocate further sites for housing within the TAYplan area.

60. In accordance with the foregoing conclusion, the council argues that adequate provision for housing in the Cupar and North West Fife Housing Market Area is contained in the proposed plan with no requirement for further allocations. On the other hand, the land-owner and CALA Homes believe that the Ferryfield site should be included within a renamed Cupar Strategic Development Area in addition to the housing land allocated at Cupar North (see site CUP 001). As proposed, it is argued, Cupar is entirely reliant on Cupar North to deliver new houses up to 2024 and it is claimed that there will be a short and medium term shortfall in housing land supply unless alternative sites are brought forward immediately.

61. I believe TAYplan is clear in designating Cupar North as a strategic development area and, whilst perhaps this might seem to be a somewhat inflexible approach, the inclusion of significant other sites in Cupar, or, as required in this case, Ferryfield, would lead to inconsistency between the strategic planning document and the local development plan.

62. I can accept that larger strategic sites such as Cupar North often require a considerable time period between allocation and implementation. Equally, sites of the size and nature of Ferryfield can be brought forward within a relatively shorter timescale. Nevertheless, as was concluded as part of the examination of the current local plan, the allocation of additional housing land beyond the scope of Cupar North could well have the effect of further delaying progress with the strategic allocation.

63. In strategic terms, therefore, I conclude that the allocation of Ferryfield as an additional housing land site, cannot be supported. Equally, the strategic development designation should be restricted to site CUOP 001, Cupar North.
64. Despite this conclusion, I have had regard to the site characteristics of Ferryfield in respect of the potential for residential development.

65. The rectangular site extends to some 6.9 hectares and it is suggested that approximately 100 houses could be constructed. The eastern boundary adjoins the settlement boundary shown in the proposed plan sloping downwards from Brighton Road to the railway line to the south. The land is currently in agricultural use. The existing boundary of the built-up area is visually clear at this point with a distinct interface between housing and agricultural land. The development of Ferryfield could present the opportunity for a more attractive boundary and I note the indicative layout shows substantial planting along the western edge of the site. Whilst accepting this would be an improvement, I do not believe it would represent an overwhelming benefit.

66. The primary access would be taken from Brighton Road beyond the existing settlement boundary and to some extent this would lead to a lack of connectivity with the town. There may be the potential for direct links with adjacent development but this would probably be limited to cycle and pedestrian routes. Clearly this would be beneficial but would not totally overcome the connectivity issue.

67. Whilst not bringing about coalescence, the development of the site would lead to an encroachment into the narrow strip of open land between Cupar and Cupar Muir to the west. Indeed, the cover of the document submitted in support of the representation very clearly shows the extent of the impact. Although not designated green belt, this is a sensitive area of land contributing to the landscape settings of both communities. I note that the site assessment indicates that the development would be highly visible especially in terms of arriving at Cupar from the south-west. The assessment also identifies the site as prime agricultural land.

68. All-in-all, the allocation of the site in the proposed plan for housing land is not justified in either strategic or site specific terms.

Candidate Site LDP-CUP003 Tarvit Farm Pitscottie Road

69. As explained above, I acknowledge that there is a shortfall in meeting the housing land requirement in the SESplan area of Fife together with the uncertainties expressed with regard to the level of that shortfall under Issue 2(b) Homes. However, the conclusions find that adequate housing land has been provided in the TAYplan area in line with the requirements set out in the strategic development plan. In addition, the 2015 Housing Land Audit has found that there is a 5-year effective housing land supply in both the Cupar and North West Fife and St Andrews and North East Fife Housing Market Areas. Accordingly, there is no strategic numerical justification to allocate further sites for housing within the TAYplan area.

70. In accordance with the foregoing conclusion, the council argues that adequate provision for housing in the Cupar and North West Fife Housing Market Area is contained in the proposed plan with no requirement for further allocations. On the other hand, Campion Homes Ltd. argues that the pursuit of Cupar North would leave no realistic prospect of housing delivery in the near future. Accordingly, additional sites should be allocated for housing to meet the shortfall.

71. I share the council’s opinion that TAYplan is clear in designating Cupar North as a strategic development area. Whilst perhaps seeming to be a somewhat inflexible
approach, the inclusion of other sites in Cupar, or, as required in this case, land at Tarvit Farm, would lead to inconsistency between the strategic planning document and the local development plan.

72. I can accept that larger strategic sites such as Cupar North often require a considerable time period between allocation and implementation. Equally, sites of smaller size can often be brought forward within a relatively shorter timescale. Nevertheless, as was concluded as part of the examination of the current local plan, the allocation of additional housing land beyond the scope of Cupar North could well have the effect of further delaying progress with the strategic allocation.

73. In strategic terms, therefore, I conclude that the allocation of Tarvit farm as an additional housing land site, cannot be supported.

74. Despite this conclusion, I have had regard to the site characteristics of the Tarvit Farm land. In this respect I note the argument by Campion Homes that the site is unconstrained and fits well with the landscape. I do not agree that the site would be acceptable in landscape terms. That part to the north-east of the B940 provides an attractive green wedge leading into Cupar. This would be lost should development take place with views from the road looking down over the houses. The most southerly part of the site, if developed, would also lead to a significant impact on the landscape setting of the town.

75. The central part of the site, south and west of the B940 and adjacent to the existing settlement boundary is also part of the sensitive landscape setting of Cupar. However, the council has recently indicated that planning permission in principle for some 49 affordable houses has been granted on this part of the larger site. The council has pointed out that this is in accordance with national policy and also reflects the suggested policy of the proposed plan whereby affordable housing proposals will be supported adjacent to settlement boundaries where there are no suitable sites within the boundary.

76. Local need for affordable housing justifies the approval states the council and it is believed that careful design could reduce the level of impact. In this respect, I note the landscape report supporting the proposal makes reference to the need for substantial tree planting. The council does not believe the planning permission in principle should lead to any changes to the proposed plan.

77. The granting of planning permission in principle for affordable housing does not guarantee the implementation of the approved development. On this basis, I agree with the council that there should be no change to the terms of the local plan. In particular, the settlement boundary should remain as shown on the Inset Map for Cupar and Cupar Muir and the land should not be allocated for development. Should the affordable housing development progress in accordance with the planning permission in principle, the settlement boundary could be assessed at the time of a future local development plan review.

Candidate Site LDP-CUP004 Land at South Road

78. The site extends to approximately 0.8 hectares of agricultural land on the west side of South Road. A “small scale development of twelve houses” is proposed. The Inset Map for Cupar and Cupar Muir shows the settlement boundary across South Road opposite part of the proposed allocation. There is a gap to the east of some 300 metres
to the settlement boundary on the same side of South Road.

79. As previously explained, I acknowledge that there is a shortfall in meeting the housing land requirement in the SESplan area of Fife together with the uncertainties expressed with regard to the level of that shortfall under Issue 2(b) Homes. However, the conclusions find that adequate housing land has been provided in the TAYplan area in line with the requirements set out in the strategic development plan. In addition, the 2015 Housing Land Audit has found that there is a 5-year effective housing land supply in both the Cupar and North West Fife and St Andrews and North East Fife Housing Market Areas. Accordingly, there is no strategic numerical justification to allocate further sites for housing within the TAYplan area.

80. The council argues that adequate provision for housing in the Cupar and North West Fife Housing Market Area is contained in the proposed plan with no requirement for further allocations. On the other hand, the land-owner believes the timeframe for the delivery of the Cupar North allocation (site CUP 001) is uncertain and that the early delivery of other land for housing is justified. In any event, it is claimed, the limited development potential of the site is such that the objectives of the spatial strategy would not be compromised.

81. I note that planning permission for affordable houses on the site was refused in 2009 despite a recommendation by council officials that the proposal should be approved. An appeal against that decision was dismissed. In dismissing the appeal, the reporter concluded that the development of the site would not represent a natural extension of the settlement boundary. He found that although the mature tree belts to the northeast and on part of the north-west boundary provide a degree of visual containment, the two houses on the latter side are clearly not within the settlement. Furthermore, he stated, the site is prominent from the A914 and A916 roads to the south-west.

82. The reporter recognised the maturing of the existing tree planting along the south-western edge would, in time, help to screen new development from the A914 but would have no effect on high level views from the A916. He did not think the site would be visually well related to the existing houses on the east side of South Road and considered the site would constitute an isolated projection of urban development into the rural setting on the west side of South Road with a gap of some 300 metres before the start of the built-up area on the west side of the road.

83. The land-owner contends that the maturing trees along the south-west edge of the site now form a significant tree belt and would largely obscure the development from the south.

84. Whilst I accept that a development of the scale proposed would have little strategic significance, and recognise that the trees on the south-west boundary have inevitably matured, I concur with the reporter’s wider assessment in the determination of the appeal.

85. In my opinion, the development of the site would not appear as a natural extension of the settlement boundary. Despite the element of screening it would not appear as “organic” growth and would not have a close visual relationship with the current periphery of Cupar on either side of South Road.
86. On the foregoing basis, I also agree with those who submitted representations in support of the non-allocation of the land for housing. All-in-all, the designation of the site for residential development is not justified.

CUPAR MUIR

Site CPM 001, Sawmill, and Cupar Muir Issues

87. The site is allocated as an opportunity site with housing as the preferred use, the estimated capacity being shown as 37. Messrs Rent a Skip indicate an interest in the site and point out that planning permission for 37 houses has been granted. Indeed, it is stated, development has started. The Cupar and North Fife Preservation Society requires the council to “take active measures” to secure the implementation of the development of the site. I accept the continued implementation and completion of the approved development would be beneficial but I do not regard this as a matter for the proposed plan which should remain unaltered in this respect.

Walled Garden and Cupar Muir Issues

88. The site lies to the immediate northeast of the settlement boundary. The land is in poor visual condition and includes the ruins of a former walled garden and associated buildings. Planning permission in principle has been granted for affordable housing.

89. Poor visual condition, in itself, does not provide a valid reason for supporting land use that would not otherwise be acceptable. However, despite various refusals of planning permission over the years, I recognise that the more recent granting of planning permission in principle for affordable housing has established the development potential of the site, at least for this type of housing.

90. Despite the council now believing there is merit in the request that the site should be brought within the settlement boundary, the planning permission in principle does not guarantee that the approved development will take place. It has long been argued by the council that the site should be regarded as beyond the settlement boundary. I consider that there is merit in that argument and the boundary should not be adjusted meantime. Should the housing development progress in accordance with the planning permission in principle, the settlement boundary could be re-assessed at the time of a future local development plan review.

91. I note the Cupar and North Fife Preservation Society again requires the council to “take active measures” to secure the implementation of the development of the site. However, as in the case of site CPM 001, Sawmill, I do not regard this as a matter for the proposed plan.

DAIRSIE

Site Dairsie 001 South of Osnaburgh Court

92. The majority of the site is allocated for residential development of 40 houses over two phases in the current local plan. The eastern portion of the site is designated countryside beyond the settlement boundary. The proposed plan allocates the existing housing land and, additionally, the land to the east for residential development. The site area is stated to be 2.8 hectares and the estimated capacity is 40 houses. Supporting
text explains the lower density reflects the rural surroundings, protects views and provides the opportunity for larger gardens or allotments. Single storey development is required.

93. Despite concerns expressed about the marketability of the site, representations on behalf of the owners have indicated support for the development of the land. I note the site is regarded as “effective” in the current housing land audit. Notwithstanding the lack of development, I therefore have no clear reason to regard the site as unmarketable. Although the proposed Cupar North development is relatively close, I believe the allocation of housing land at Dairsie, a separate settlement, contributes to the provision of a choice of locations.

94. The site is prime agricultural land, as confirmed in the site assessment, but the council has explained that the wider housing land requirements have led to the inevitable allocation for development of some agricultural land in this category. I recognise the tension between these competing land use requirements and accept that some loss of prime land will occur. In this case, the previous allocation of most of the site for housing indicates that the development potential has been established. I therefore accept that the housing allocation should take precedence over the existing agricultural use of the land.

95. I note the suggestion that poor access to the site would lead to traffic problems. However, the council argues that multiple access points would be possible. I assume that to achieve this objective, a new access to Station Road, south of the existing settlement boundary is envisaged along with an access to the western part of the site from Osnaburgh Court. The council confirms liaison with the Transportation Services and, lacking any objections from the department, I conclude that traffic generation is not a constraint to warrant the deletion of the allocation.

96. The provision of an access via Osnaburgh Court would secure a link between new development on the site and the existing village. I consider this would assist in the integration of any new houses into the existing fabric of Dairsie.

97. Impact on privacy is a matter of detailed design and layout and I do not believe that concerns of this nature constitute a fundamental shortcoming of the site which would point to the non-allocation of the land. Although the text refers to the protection of views, loss of outlook is not usually a planning consideration. In any event, the land slopes away from the existing development and domination of the existing neighbouring houses could be prevented by means of careful design. These are matters for assessment as part of the development management process.

98. I have also noted the criticism of the consultation process but this examination of the merits of the site indicates that the various representations are being taken into account.

99. Overall, I conclude that site DAI 001 should remain in the proposed plan.

100. It has been suggested by the land owner that the estimated capacity is too low: the increased site area justifies a higher number of houses. The requirement to limit development to single storey buildings is also questioned. I recognise the council’s objective of reflecting the style of nearby housing and accept that this supports the case for height control. I also accept that a lower density would be appropriate on this site,
lying within the context of a generally rural setting. I therefore consider there is merit in both the relatively low density specified and the imposition of single storey development. Indeed, as a consequence of single storey development, larger plot sizes could well lead to a lower overall density. Whilst I have pointed out that loss of a view is not material to a planning assessment, the lower density could also provide the potential to reduce the visual impact of new development on existing houses. I therefore conclude that both the estimated capacity and the single storey limitation are justified and should not be amended.

**PEAT INN**

Settlement boundary extension

101. As previously explained, I acknowledge that there is a shortfall in meeting the housing land requirement in the SESplan area of Fife together with the uncertainties expressed with regard to the level of that shortfall under Issue 2(b) Homes. However, the conclusions find that adequate housing land has been provided in the TAYplan area in line with the requirements set out in the strategic development plan. In addition, the 2015 Housing Land Audit has found that there is a 5-year effective housing land supply in both the Cupar and North West Fife and St Andrews and North East Fife Housing Market Areas. Accordingly, there is no strategic numerical justification to allocate further sites for housing within the TAYplan area.

102. Despite the foregoing finding, I recognise that the required extension to the village envelope at Peat Inn is small with a very limited capacity for additional houses. Indeed, I accept that the suggested three houses would have no strategic implications.

103. The relatively recent houses that have been constructed to the eastern side of Peat Inn are arranged around an open area of ground and face the longer established part of this small village. Although not part of the linear form of the village, the houses nevertheless appear as an integral part of Peat Inn. In addition to this carefully designed layout, the housing group forms a clear and satisfactory edge to the village. An extension of the settlement boundary further east beyond the new houses would breach the established boundary and would not relate well to Peat Inn. The unacceptable impact would be further exacerbated as any houses built on the extended area would be at a higher level than existing development and would be physically and visually dominant.

104. All-in-all, I conclude that the suggested extension of the settlement boundary could lead to unacceptable development and therefore the proposed plan should remain unchanged in this respect.

**PITSCOTTIE**

Candidate site LPD-PIS001, Cupar Road

105. As previously explained, I acknowledge that there is a shortfall in meeting the housing land requirement in the SESplan area of Fife together with the uncertainties expressed with regard to the level of that shortfall under Issue 2(b) Homes. However, the conclusions find that adequate housing land has been provided in the TAYplan area in line with the requirements set out in the strategic development plan. In addition, the 2015 Housing Land Audit has found that there is a 5-year effective housing land
supply in both the Cupar and North West Fife and St Andrews and North East Fife Housing Market Areas. Accordingly, there is no strategic numerical justification to allocate further sites for housing within the TAYplan area.

106. I recognise that the development area of the proposed site is relatively small (some 1.3 hectares with an indicative capacity of about 14 houses) and accept that this scale of development would have limited strategic implications.

107. The site would extend the settlement boundary northwards beyond a relatively recent residential development. However, the extension would be on ground at a higher level. The recent development virtually “nestles” into the lower part of the rising ground and forms an integral part of the village with a well-formed and satisfactory boundary in both visual and topographical respects. Houses on the higher ground of the proposed extension area would breach the boundary and lead to a visually prominent development which would not relate well to the village. Although tree planting and woodland creation is proposed, I do not believe that an acceptable level of visual mitigation would be achieved to allow the proposal to proceed.

108. Furthermore, whilst it is proposed to establish a footpath link through from the proposed development to the existing houses, the vehicular access would be at a point beyond the current village boundary. This would be unsatisfactory and would not represent natural or “organic” growth of Pitscottie.

109. Overall, for the reasons described above, I conclude that the suggested residential allocation could lead to unacceptable development and therefore the proposed plan should remain unchanged in this respect.

SPRINGFIELD

Site SPF 002 East of Crawford Park

110. Despite several representations objecting to this housing land allocation, planning permission has been granted for 43 houses under reference 15/01189 FULL and development is now underway. Under these circumstances, the planning process having moved forward, it is clearly necessary to leave the proposed plan unaltered in respect of site SPF 002.

Candidate site LDP-SPF001 Land to south of Springfield

111. JC Lang & Son argues that the allocation of the site would allow effective housing land to be delivered thereby ensuring a continuous five-year supply amidst ongoing uncertainty about the ability of the Cupar North Strategic Development Area to provide an adequate housing supply.

112. As previously explained, I acknowledge that there is a shortfall in meeting the housing land requirement in the SESplan area of Fife together with the uncertainties expressed with regard to the level of that shortfall under issue 2(b) Homes. However, the conclusions find that adequate housing land has been provided in the TAYplan area in line with the requirements set out in the strategic development plan. In addition, the 2015 Housing Land Audit has found that there is a 5-year effective housing land supply in both the Cupar and North West Fife and St Andrews and North East Fife Housing Market Areas. Accordingly, there is no strategic numerical justification to
allocate further sites for housing within the TAYplan area.

113. In accordance with the foregoing conclusion, the council argues that adequate provision for housing in the Cupar and North West Fife Housing Market Area is contained in the proposed plan with no requirement for further allocations.

114. Insofar as the Cupar North Strategic Development Area accords with the provisions of TAYplan, it is clear that house-building will be concentrated at that location. Despite the concerns that have been expressed about the level and phasing of delivery, the scope for further housing land allocations is inevitably very limited. Indeed, the spatial strategy emphasises that “New development opportunities are not supported in close proximity to Cupar…”

115. Nevertheless, some sites for housing in the villages surrounding Cupar are allocated in the proposed plan. These are relatively small in scale and are intended to satisfy local housing needs. Indeed, site SPF 002, East of Crawford Park, a proposal in Springfield, is an allocation contained in the current local plan. The estimated capacity of that site, which is now under construction, is 50. Site LDP-SPF001 has a potential capacity of some 65-70 houses (I note the indicative layout provided shows 71 houses) and, in my opinion, this would involve a level of further development that could not be justified in local terms.

116. I note that JC Lang & Son emphasises the terms of the previous local plan examination report and the lack of any mention of constraints to the development of the site. Indeed, despite the concerns expressed by those representations supporting the non-allocation of the site, I accept that in various respects the land can be regarded as effective. However, it seems to me that the reporter focussed his recommendation on the lack of need for additional housing land and did not undertake a detailed assessment of the site characteristics. In my opinion, the wider situation remains fundamental to the allocation of housing land in the vicinity of Cupar and, at this time, the further release of greenfield sites is not justified.

117. In any event, although the site lies adjacent to the settlement boundary, there would not be a close relationship between the proposed development and the existing village. The access would be from the junction of Main Street and Station Road via Manse Road. This indirect approach would be in contrast to the existing built form of the village which is essentially linear. Combined with the ongoing development on site SPF 002, the location of site LDP-SPF001 fails the effectiveness test in respect of land use.

118. I have also noted the numerous representations submitted in support of the non-allocation of the site and, as explained, particularly share the concern of the prospect of a further development of approximately 70 houses in terms of impact on the character of the village.

119. Overall, I conclude that the allocation for housing of site LDP-SPF001 is not justified and the proposed plan should not be changed in this respect.
Reporter’s recommendations:

I recommend that the following modifications be made:

1. On page 42, delete CER 001, Doves Loan, and replace as follows:

<table>
<thead>
<tr>
<th>Ref:</th>
<th>CER 001</th>
</tr>
</thead>
<tbody>
<tr>
<td>Location:</td>
<td>Land at Baltilly</td>
</tr>
<tr>
<td>Area (ha):</td>
<td>2</td>
</tr>
<tr>
<td>Description:</td>
<td>Housing</td>
</tr>
<tr>
<td>Est. capacity:</td>
<td>19</td>
</tr>
<tr>
<td>Lead Agency:</td>
<td>Private Sector</td>
</tr>
</tbody>
</table>

“Status, additional development requirements, and other information – satisfactory access to be agreed”

Additionally, any green network priorities for the site should be included.

2. On the Inset Map – Ceres, delete site CER 001, designate the land within the local landscape area designation and adjust the settlement boundary accordingly.

3. On the Inset Map – Ceres, insert a new site CER 001 on land at Baltilly, in accordance with the land outlined in red on the site map attached to representation PP-1900, Allocation Boundary Portal, delete the local landscape area designation and adjust the settlement boundary to include new site CER 001.

4. On page 57, amend the text of site CUP 001, Cupar North Strategic Development Area as follows:

   delete: “Fund and construct relief road in a phased manner as housing development progresses, including junctions at A91. Funding and delivery to be secured via legal agreement.”

   and replace with:

   “The Cupar North Consortium is undertaking the majority of the Cupar North development and will be largely responsible for the funding and construction of the associated relief road including junctions with the A91. This work is required to be completed no later than the completion of the 600th house by the Consortium.”

5. On the Inset Map – Cupar and Cupar Muir, adjust the boundary of site CUP 001, Cupar North Strategic Development Area, by removing from the allocation the small area of land to the rear (north) of 19 Back Lebanon identified as “Zoned Area” in the Title Plan attached to representation PP-237.

6. On the Inset Map – Cupar & Cupar Muir, adjust the settlement boundary for Cupar Muir to incorporate the walled garden to the northeast of the village as contained in the planning permission in principle, dated 3 March 2014 under reference 13/02401/PPP.
7. On page 59, add the following development requirement to site CUP 005, Former Granary Site, Station Road:

“A flood risk assessment requires to be undertaken prior to development on this site. Design of development must take account of the findings of the flood risk assessment.”

8. On page 59, amend the text of site CUP 006, Former ATS Depot, St Catherine Street/East Bridge to:

“Town centre development opportunity where a careful balance between built development and open space is required and account taken of key frontages to St Catherine Street and East Bridge.”
<table>
<thead>
<tr>
<th>Issue 18</th>
<th>Auchtermuchty, Falkland, Ladybank and Surrounding Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reporter:</td>
<td>Katrina Rice</td>
</tr>
<tr>
<td>Body or person(s) submitting a representation raising the issue (including reference number):</td>
<td></td>
</tr>
</tbody>
</table>

**AUCHTERMUCHTY**

Auchtermuchty issues

- Muir Homes Ltd (1850)
- Tanner and Adamson (2029)
- A A and J Brand (2095)
- Helen Bowman (2231)

**AUC001**

- Helen Bowman (1533)
- William Bowman (1545)
- SEPA (3305)

**AUC002**

- Edward Link (40)
- Stewart Brown (181)
- Heather Donaldson (1400)
- Helen Bowman (1534)
- William Bowman (1543)
- Jean Bell (1739)
- Muir Homes Ltd (1845)
- Brian Slattery (1868)
- Mary White (2234)
- Alex Dewar (2286)
- Susan Carney (2401)
- Roy and Wendy Nicoll (3108)

**AUC003**

- SEPA (3306)

**FALKLAND**

Falkland issues

- Richard Gibb (474)

**FAL001 (contd)**

- A A and J Brand (2085)
- Nick Wilding (2111)
- Colin Irving (2236)
- Niall Hedderman (2272)
- C McLeod (2377)
- Anne Barclay (2422)
- David and Roslyn Blair (2567)
- Marilyn Workman (3016)
- Michael Tudor (3080)
- Lorna Henry (3332)
- SEPA (3403)
- Falkland & Newton of Falkland Community Council (3657)
- Ruth Williams (3661)

**FREUCHIE**

- Mr and Mrs Simpson (1171)
- James Eadie (1180)
- Neil Paterson (1218)
- Freuchie Community Council (1514, 1523)
- David McCulloch (1745)
- Angus Watt (1791) (1541)
- Dumbreck and Mitusch Family Heritable Interests (2054)
- Chris Bell (2141)
- A B Cran (2368)
- David A Alexander (2375)
- Gordon Fyall (2383)
- Angie Pick (2518)
- Daniel Campbell (2732)
- Ian Cowie (2992)
- J Drumond (3024)
- Hugh Ward (3173)
- Karen Steele (3175)
- P A Steele (3663)
- D P Drummond (3666)
- Joan A Cran (3668)
Provision of the development plan to which the issue relates:

Settlement Plans – Auchtermuchty (page24), Falkland (page85), Freuchie, Ladybank (page 124), Strathmiglo and Countryside Area (LWD004 & LWD027) (pages 182 and 187).

Planning authority’s summary of the representation(s):

**AUCHTERMUCHTY**

**AUC001 – East of Stratheden Place**

Helen Bowman (1533); William Bowman (1545); SEPA (3305) support development as it
would bring:

- Long term development potential and solutions to existing needs.
- Drainage issues could be resolved.
- Site could accommodate Auchtermuchty’s housing requirements.
- Enable the Council to consider much needed road improvements in the village.
- Easy traffic access; avoids congestion in village.
- Site will facilitate long term planning in a way site AUC002 cannot.

AUC002 – Land West of Millflat

Edward Link (40); Stewart Brown (181); Helen Bowman (1534); Heather Donaldson (1400); Jean Bell (1739); William Bowman (1543); Brian Slattery (1868); Alex Dewar (2286); Mary White (2234); Susan Carney (2401); Roy and Wendy Nicoll (3108) object to the allocation of the above site for one or more of the following issues:

Principle of Development

- Allocation not made through demand for residential accommodation.
- Site will lead to further development.
- Alternative sites should be explored – Candidate Site AUC001.

Size and Location

- Site more suited to small local building developments or single plots for self-builder.

Infrastructure and Services

- Sub-standard infrastructure.
- Same access and drainage problems as rejected sites in the village.
- Inadequate Sewage/Drainage capacity.
- School capacity.
- Health centre capacity.

Transportation

- Limited vehicular access with surrounding roads either narrow or limited to single file/one way traffic.
- Concerned about impact of traffic on an already congested road.
- Increased traffic on existing substandard roads raise roads safety concerns.
- Existing parking issues within village.

Economy

- Lack of employment opportunities in village.

Landscape, Townscape, Views and Character

- Built and natural heritage compromised – clarification sought on “No development should be within 10m of boundary trees/hedgerows”.

1019
PROPOSED FIFE LOCAL DEVELOPMENT PLAN

- Loss of countryside view.

Environment

- Increase in noise pollution.
- Increase in air pollution.

Miscellaneous

- Devaluation of area.

Muir Homes (1845) support allocation of the site on the following grounds:

- Site in control of recognised house builder.
- Funding in place so site fully deliverable.
- Support the village and its local services/infrastructure.
- Provide enhanced choice of housing Inc. affordable.
- Fully integrate into settlement.
- No access, landscape or infrastructure issues.
- No material impact in Cupar North Strategic Development Area.
- More effective than proposed allocations in Newburgh & Falkland.
- Primary School has capacity for up to an additional 46 children.
- Scottish Water confirmed drainage capacity issues can be addressed.

AUC003 – North of Old Station Road (Sterling Warehouse)

SEPA (3306) supports the inclusion of the site subject to requirements.

Sites (not in the Proposed FIFEplan) proposed by Objectors

Candidate Site LDP-AUC002 - Leckybank and Lochiebank Farms

Muir Homes (1850) objects to non-allocation for residential development providing the following argument for the sites inclusion. Two options are being put forward, the entire site for up to 120 units and a smaller site for up to 50 units. Both are considered to be preferable to the LDP AUC002 albeit there remains merit in this proposed allocation:

- A detailed assessment of the site and the surrounding landscape is set out within the submitted Landscape and Visual Appraisal;
- Details of the range of access options are set out within the submitted Transport Appraisal;
- A development concept for the site is outlined within the Indicative Masterplan
- Effectiveness Assessment demonstrates that allocation of either site option would be fully deliverable and contribute positively to the TAYplan and FIFEplan delivery strategy.
- Such an allocation would support Auchtermuchty and its local services/infrastructure, while providing an enhanced choice of housing, including affordable housing.
- The Primary School in Auchtermuchty has capacity for up to an additional 46 children.
Scottish Water has confirmed that the present drainage capacity issues can be addressed to facilitate the proposed development.

Helen Bowman (2231) makes comment with reference to detailed submission by Muir Homes (1850), above, on the failure to allocate land at Leckybank and Lochiebank Farms requesting that since this detailed 'comment' does not form part of the Consultation Document it should be considered separately from it. The "Indicative Master Plan" and related documents of Muir Homes not only affects the sites but has huge potential impact on Auchtermuchty.

Candidate Site LDP-AUC001 – Land to South East of Auchtermuchty

Tanner and Adamson (2029) object to non-allocation of candidate site LDP-AUC001 and provided case for inclusion within the plan:

- Limited housing development opportunities allocated within FIFEplan restricts the growth of the village unnecessarily.
- The eastern site boundary of the site would run parallel with the built development on the northern side of the A91 (Mathieson Gardens) and would be a natural, modest and sustainable expansion of the village envelope.
- Well located for public transport, Primary School and local services and has the ability to provide two vehicular accesses.
- Development could be suitably absorbed within an enhanced landscape context, providing significant benefits to the visual appearance of the existing urban edge.

Candidate site LDP- AUC004 – Land at Low Road

Neil Brand (2095) objects to the non-allocation of candidate site AUC004 and argues that:

- Site represents a logical gap/infill site for housing.
- Compatible with its surroundings and consistent with the pattern of development immediately adjacent.
- Concept plans have been submitted which illustrate how visual impact can be reduced and outlook to the south retained, along with the creation of a defensible settlement boundary.
- Lack of constraints, accessibility and sustainable location provide the ability for this site to be an effective housing site.

FALKLAND

Falkland Issues

Richard Gibb (474) - A long term solution to traffic problems and housing need in Falkland could involve an eastern village bypass releasing land for future housing development without increasing traffic in the historic parts of the village.

FAL001 – St. John's Works

Susan Moody (29); Calum Beaton (61); Patricia Lessels (62); Jamie Robb (378); Scott Fraser-Collins (380); Richard Gibb (471); Rachel Fraser (651); Eilidh Hodgson (623);
George Sinclair (600); Kevin Clapcott (643); Raymond Kelly (647); Amanda Ridings (1260); Roz Paton (1235); Heather Crawford (1262); Bruce Bennett (1380); Lisa Irving (1396, 1570); Colin Irving (2236); Rosemary McAllister (1402); Keith Jackson (1418); Tim Drew (1453); George McLuckie (1479); Stuart Haszeldine (1620); Aaron Marshall (1856); Robert Marshall (1846, 828); Aislinn Haszeldine (1800); Allen Colverson & Tess Darwin (1760); Irene Tudor (1768); Elaine Pattison (1783); Kirsty Tudor (1763, 1755); Caren Gilbert (2114); Nick Wilding (2211); Niall Hedderman (2272); C McLeod (2377); Anne Barclay (2422); Michael Tudor (3080); Marilyn Workman (3016); Lorna Henry (3332); Ruth Williams (3661); Ernest Crawford (728); Michael Lawrenson (1250); Rod Crawford (1291); David and Roslyn Blair (2567) object to the allocation of the site on one or more of the following grounds:

**Principle of Development**

- Although in favour of developing the brownfield site, the Greenfield site to the south should not be developed, this is amenity land and lies outwith the village boundary.
- The site is currently designated employment land - the change to purely residential is not the best use of this site.
- An imaginative approach should be sought encompassing provision of car parking; social housing; employment all taking account of the uniqueness of the village.
- There is no connection between the settlement plan and the inspiration and potential in the Fife Spatial Strategy - Falkland represents a unique opportunity for Fife Council to rise to the principles set out in the strategy, and to be an exemplar of putting into practice its aspirations for successful places.

**Scale and Location**

- Site has radically altered in size from previous designation in the St Andrews and East Fife Local Plan of October 2012 - 100 homes is excessive and would place far too much pressure on the infrastructure of the village.
- Site should only be developed with restrictions in place such as limiting number of dwellings on site - concerns over the ratio of new houses to existing number of properties; density of properties and change to character of village.
- The plan proposes a scheme which results in a use primarily for new homes; scale of potential development is inappropriate for the size of the village and existing facilities and is unlikely to fit with the existing character, scale and form of the settlement.
- Falkland is a small village and the residents would like it to stay that way.

**Landscape, Townscape, Views and Character**

- The Greenfield land, protected as ‘landscape area’ must not be included in the site.
- Unsympathetic redevelopment of a historic site and village – the factory element of the site has potential to be developed sympathetically.
- Contravenes Fife Council’s “Conservation Area Appraisal & Management Plan”-detailed analysis provided within original objection (1800).
- The historic core of the village will be materially affected in terms of safety, preservation, improvement, enhancement, and interpretation of the historic built environment.
Transport

- Increase in traffic/negative impact on existing transportation infrastructure.
- No secondary access road should be provided - providing a back road into Falkland in addition to the development would open flood gates to further proposals for Falkland.
- Clarification sought on plans for the east side of the site where Wellbrae is already very narrow and has parking issues.

Economy

- Potential negative fiscal impact on business, tourism and ambience of a large modern development in a historic village.
- The challenges facing the community of Falkland were identified as being local employment opportunities (lack of small employment units, flexible work space and studios and broad band connectivity); affordable local housing; traffic management (environmental impact, including parking) and sustainability (economic and environmental).
- Concern that the original proposal for a ‘mixed use development ‘ of the ‘protected employment land ‘ has now been reduced to half a hectare and the rest of the now extended site being allocated for a non-classified housing development. The revised approach conflicts with a number of policies outlined in Fife Partnership strategies namely Fife Economic Strategy (2013-23); Fife’s Community Plan (2011-20) and Local Housing Strategy (2010-15) – comments have been expanded upon within the original representation (3016).
- Factory site should be redeveloped with affordable housing and business provision; luxury housing only on site would not have a long term benefit for the community.

Infrastructure and Services

- Existing drainage and flooding problems in Falkland - unable to sustain increased capacity.
- Impact on primary school and health centre capacity - no mention in the proposal of community infrastructure to include community and commercial facilities, healthcare, nursing homes and surgeries or education provision.

Amenity

- Detrimental effect on residential amenity of neighbouring properties.

Environment

- Negative environmental and structural decay and effect of the increased traffic, air and noise pollution in and around historic buildings and locations.
- No investigation has been done into contamination of the site.

Housing/Affordable Housing

- Recognise more housing is needed in the village, long term solution could involve an eastern village bypass releasing land for development and removing traffic from the village.
• Factory site should be redeveloped to include affordable housing.

Miscellaneous

• If the developer was to work with the community it would benefit everyone.
• Insufficient consultation carried out regarding the proposal – require clarity and transparency of how these proposals have been made.

Muir Homes (575) objects to the allocation on grounds that:

• The proposed allocation of this site represents the most significant new residential proposal in the Cupar/Howe of Fife sub-area, despite the fact that it is presently non-effective.
• One-third of the site sits outwith the existing Falkland settlement boundary within the designated Special Landscape Area
• No assessment/rationale for the extension of the site outwith the settlement/brownfield area is presently demonstrated and therefore the existing settlement boundary should be retained in order to address the landscape setting of the village.
• Unclear whether the site is being supported for mixed residential/employment use in accordance with the Reporter’s Local Plan conclusions as such a position would reduce the available land for housing albeit this approach would be fully justified in light of the former/current (part) use of the site.
• St Johns Works is a significant industrial complex with a range of large buildings which would need to be removed in order to accommodate development. There are likely to be residual contamination issues to be addressed and level issues are readily apparent throughout the site and in the agricultural land to the south.
• Site Assessment notes potential flooding within the site, impact on the landscape setting of Falkland, the need for setbacks within the site and potential impacts on built heritage all as potential constraints to the development, all representing an inappropriate residential land allocation.
• A more appropriate approach would be to allocate the site as an “Opportunity Site” with supporting text outlining the acceptable range of uses, including residential.

A A and J (2085) objects to the allocation on the following grounds:

• Proposed Plan is regarded as premature at this time
• In the absence of any active private sector interest at this time, the deliverability of the site is questionable.
• As the site is located within an historical village, the design approach required may impact on deliverability due to the additional costs likely to meet these design requirements.
• Substantial remediation works are likely to be required including removal of contamination associated with current use.
• The proposed allocation fails to meet the Tests of effectiveness in PAN 2/2010 – Affordable Housing and Housing Land Audits due to the existence of these constraints.
• The allocation would be contrary to the Policy Principles of SPP (June 2014) as the site is unlikely to deliver that proportion of the required housing to meet the identified shortfall within the period of the plan.
• No objection for the site to be regarded as a suitable windfall site or as an
“Opportunity Site” outlining the suitable uses/form of development that would be acceptable on the site.

Falkland & Newton of Falkland Community Council (3657) confirms its support for the Brownfield site as suitable for a mix of housing and light industry/commercial/cultural development but does not support the Greenfield extension South beyond the original factory site. Support is subject to the following points:

- number of houses should be limited so that unreasonable pressure is not created on services and the character of the village;
- house design must be appropriate to the context of Falkland as a conservation village;
- significant proportion of the housing should be for Social Housing and Affordable Housing;
- should be a requirement that a significant amount of the site be for light industrial/commercial/cultural development;
- Existing one storey office block be retained for Community use and adequate parking and recreational areas be provided.

Object to the site being extended South onto a Greenfield site and beyond the Brownfield site on the grounds that:

- Significant house building would have a major and detrimental effect on the character of this historic village;
- Create a dominant and unacceptable visual impact;
- Land is protected local landscape area;
- Extending the site South goes beyond the village envelope which may set a precedent for further breaches of the village envelope;
- More housing will intensify traffic and would put pressure on the village roads;
- More pressure on GP services;
- Flood Risk Assessment is even more urgent if this development takes place and may be an issue with the capacity of the Primary School to cope.

Clare Davidson (1542) – Has no objection in principle to the development on grounds that the proposed-building should only occur within the existing factory boundaries; be of a sympathetic nature and access to the site is carefully considered and does not impact significantly on existing access routes. Landscaping of the site will be a significant part of the development. The school is already running desperately below capacity and would both welcome and be able to accommodate a substantial increase in role.

Smith Anderson (1941) - The site at Falkland is not a simple site to develop due to the costs of demolition, contamination remediation and physical topography.

Scottish Environment Protection Agency (3403) – Support the inclusion within the Developers requirements for a Flood Risk Assessment to be undertaken.

FREUCHIE

Sites (not in the Proposed FIFEplan) proposed by Objectors

Candidate Site LDP–FRE001 - Bridgend

Lynch Homes (3711) objects to the non-inclusion of the Bridgend site (Candidate Site...
LDP-FRE001) on the basis that: the proposal is in a sustainable location; the site has the landscape capacity to accommodate the scale of development proposed; and its approval would assist the Council meet its housing land requirement, helping maintain a 5 year effective housing land supply as required by TAYplan and Scottish Ministers.

Candidate Site LDP-FRE002 – West of Walter Lumsden Court

With regard to the site at Walter Lumsden Court (Candidate Site LDP-FRE002), Dumbreck and Mitusch Family Heritable Interests (2054) object to its non-inclusion in FIFEplan on the basis that the site is an organic addition to Freuchie, which can assist in meeting the housing land requirement and provide support for local facilities, such as the school, at a time when there are no other proposals for Freuchie being promoted by FIFEplan. The representee considers that it has addressed concerns relating to access by securing a second access to the site and disputes the assertion that the land is “prone to flooding”, though agrees that a Flood Risk Assessment is necessary for the site.

In relation to these two sites in Freuchie, Mr & Mrs Simpson (1171), James Eadie (1180), Neil Paterson (1218), Cy Crane (1224), Freuchie Community Council (1514, 1523), Angus Watt (1791, 1541), David McCulloch (1745), Chris Bell (2141), Mr & Mrs A B Cran (2368), David A Alexander (2375), Gordon Fyall (2383), Angie Pick (2518), Daniel Campbell (2732), Ian Cowie (2992), J Drummond (3024), Hugh Ward (3173), Karen Steele (3175), P A Steele (3663), D P Drummond (3666), Joan Allesone Cran (3668) all support the Proposed FIFEplan position of not including the sites as housing allocations for some or all of the following reasons:

- There is no strategic planning policy support for any further development in Freuchie as it is not identified as a priority settlement in the approved TAYplan;
- Both sites are situated on land classified as prime agricultural land, the permanent loss of which would be detrimental environmentally, leading to increased food miles and threats to biodiversity;
- New developments in the locations being considered would severely threaten the attractive landscape setting of the area, which borders on the Lomond Hills Local Landscape Area;
- Both sites are at risk from flooding and the entire drainage infrastructure of the village is already at or beyond capacity. It is considered that further residential development in Freuchie will only exacerbate these problems;
- Future growth in population in Freuchie would add to the existing pressures on the village, including placing great strain on a school infrastructure which is already considered not fit for purpose, and could not be described as “organic growth” as the developers claim;
- Both sites raise road safety concerns for pedestrians, cyclists and vehicles;
- The site at Walter Lumsden Court, in particular, is considered to be deficient in the context of the Scottish Government’s “Designing Streets” guidance, with poor access to public transport (over 400m to a bus stop); and
- Concern is also expressed that the promoter of the site at Walter Lumsden Court has made an alleged false and misleading statement that the land has not been used for agricultural purposes for some 25 years, with evidence led that the tenant farmer ploughed the field in recent years and successfully grows grass for animal feed.
**LADYBANK**

**Ladybank Issues**

David Grant (597) objects to the lands of Ladybank Bowling Club, and surroundings, being designated as a Protected Open Space when clearly it is neither open, nor in public ownership.

**LAD001 – Commercial Crescent**

SEPA (3544) supports the inclusion of the site subject to requirements.

**LAD002 – Cupar Road**

David Grant (596) wished to resubmit suggestion that site LAD002 be taken forward, and indeed expanded from its current extent, but also be tied to a new A92 roundabout just south of Cairnfield. This would also allow the stopping up of six or seven very sub-standard access/egresses to/from the A92 and have a major impact on road safety.

**LAD004 – The Road End, Loftybank**

M Aitken (1877) – Clients welcome the inclusion of the site within the proposed plan, however contend that the site is also suitable for a greater number of “affordable houses” as an appropriate alternative to 6 detached houses. In essence the site can accommodate anywhere between 6 and 22 houses depending on their size and their layout within the site.

Mr & Mrs J O’Neil (2399) asks that existing drainage problem; traffic congestion at Monkmoss; loss of view and noise issues be taken into consideration when assessing this site.

SEPA (3545) supports the inclusion of the site subject to requirements.

**STRATHMIGLÓ**

**Sites (not in the Proposed FIFEplan) proposed by Objectors**

Gladman Developments Ltd (2733) objects to the non-inclusion of the site at East and West Back Dykes, which is considered to provide an attractive, accessible and effective option for planned growth in the settlement during the FIFEplan period. Gladman indicates that the site is deliverable in the short term and would make a worthwhile contribution to the effective five year housing land supply for the Cupar and North West Fife HMA, without threatening the deliverability of the Cupar North Strategic Development Area.

Robert Hopkins (1010) Objects to the non-inclusion of land for housing at Bellfield, Strathmiglo, on the basis that: the site has an extant planning permission in principle for 5 houses; it is a well located and effective site; and it can contribute towards meeting the housing land requirement whilst being of such a scale that it would not undermine the Development Plan strategy of concentrating new development at the Cupar North Strategic Development Area.
COUNTRYSIDE AREA

LWD004 – Pitlair 2, Bow of Fife

SEPA (3260) object to the allocation of this site. Review of the Scottish Environment Protection Agency (SEPA) Flood Map (2014) shows that the entire site is at risk of fluvial flooding. A detailed flood risk assessment has been undertaken for the extension of the nursing home to the north of the site and the findings show that the proposed development site is at risk of flooding from the 1 in 50 year flood event. The development of this site will not only be at risk of flooding, but also increase the risk of flooding to neighbouring areas and properties. The SEPA Surface Water Flood Map also shows that the entire development site is at risk of surface water flooding. This further supports SEPA’s view that the site is unsuitable for development. To develop this site would be contrary to:

- Authority’s duties under the Flood Risk Management (Scotland) Act 2009;
- Guidance set out in SPP which states in paragraph 256 that “the planning system should prevent development which would have a significant probability of being affected by flooding or would increase the probability of flooding elsewhere. Piecemeal reduction of the functional floodplain should be avoided given the cumulative effects of reducing storage capacity”;
- Policy 12, Flooding and the Water Environment in the proposed Local Development plan; and
- The statutory guidance produced by Scottish Government entitled Delivering Sustainable Flood Management which establishes the overarching outcomes for Scotland including “Flood management actions being undertaken that will stand the test of time and be adaptable to future changes in the climate “ Development on the functional flood plain would be contrary to climate change mitigation as it will increase the number of people residing in an area at risk of flooding who would be effected by increased flooding due to sea level rise or increased precipitation.

The proposal site has an existing planning permission (13/03407/FULL) (see Supporting Documents SD1 and SD2) for residential development. SEPA have no record of being consulted on the proposal at the time of the planning application. Notwithstanding that the site as an existing planning permission there are considerable concerns regarding the effectiveness of the site and any future application will not be supported at this location due to flood risk based on the information currently available and request that the allocation is removed from the plan entirely.

LWD027 – Lower Melville Woods, Ladybank

Giffordtown & District Community Council (281) object to the proposed plan and are against expansion of this site and request to see justification for it. Especially opposed to further expansion towards Melville Lodge’s roundabout and the long suffering of occupants of Windmill Cottage. If permitted development requirements should at this stage include ample and effective advance screening from the A91 and A92.

Philip Hutchinson (902) object to Melville Wood Landfill Expansion and queries the map which shows the existing landfill site extending on its north east side into the low-lying area of reclaimed farmland to the south west of Melville Lodges Roundabout; the north-east boundary of this allocation should be trimmed back on the plan to correspond to the
present boundaries on the ground. Any expansion into the field to the north east should be restricted to the addition of screen planting. No particular objection to the landfill extending west into the plant yard and stockpile area of the Collessie Quarry.

SEPA (3568) support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken; the inclusion of a Site Requirement for a buffer strip along the watercourse as this measure will help protect and improve the water environment and that a 20m buffer strip may be appropriate and the inclusion of the requirement to consider through a feasibility study, the potential for restoration and improvement of the water environment through the site design.

**Modifications sought by those submitting representations:**

**AUCHTERMUCHTY**

**AUC001 – East of Stratheden Place**

Helen Bowman (1533); William Bowman (1545); SEPA (3305): none stated.

**AUC002 – Land West of Millflat**

Edward Link (40); Stewart Brown (181); Helen Bowman (1534); Heather Donaldson (1400); Jean Bell (1739); William Bowman (1543); Brian Slattery (1868); Alex Dewar (2286); Mary White (2234); Susan Carney (2401); Roy and Wendy Nicoll (3108) seek removal of site AUC002.

Muir Homes (1845): none stated.

**AUC003 – North of Old Station Road (Sterling Warehouse)**

SEPA (3306): none stated.

**Sites (not in the Proposed FIFEplan) proposed by Objectors**

**Candidate Site LDP-AUC002 - Leckybank and Lochiebank Farms**

Muir Homes (1850) seek inclusion of sites at Leckybank and Lochiebank Farms for residential development. Two options are being put forward by the developer, the entire site for up to 120 units and a smaller site for up to 50 units. The representation seeking to alter the site’s status for inclusion in the Proposed Plan has been attached and expanded upon within the objection and appendices.

Helen Bowman (2231): none stated.

**Candidate Site LDP-AUC001- Land to South East of Auchtermuchty**

Tanner and Adamson (2029): seek the allocation of Candidate site AUC001 for housing within the settlement of Auchtermuchty and request that the particular merits of this site are reconsidered prior to the examination.
Candidate site LDP- AUC004 – Land at Low Road

A A and J Brand (2095): seeks modification to amend the settlement boundary at Low Road, Auchtermuchty to include the land shown on the submitted concept plans and to amend the Auchtermuchty Settlement Plan to include an allocation for housing at Land South of Low Road, Auchtermuchty with a potential capacity of 30 units.

FALKLAND

Falkland Issues

Richard Gibb (474): Include plans for an eastern village bypass to free up land for housing that does not affect the historical part of the town.

FAL001 – St John’s Works

Susan Moody (29); Calum Beaton (61); Patricia Lessels (62); Jamie Robb (378); Scott Fraser-Collins (380); Richard Gibb (471); Rachel Fraser (651); Eilidh Hodgson (623); George Sinclair (600); Kevin Clapcott (643); Raymond Kelly (647); Amanda Ridings (1260); Roz Paton (1235); Heather Crawford (1262); Bruce Bennett (1380); Lisa Irving (1396, 1570); Colin Irving (2236); Rosemary McAllister (1402); Keith Jackson (1418); Tim Drew (1453); George McLuckie (1479); Stuart Haszeldine (1620); Aaron Marshall (1856); Robert Marshall (1846, 828); Aislinn Haszeldine (1800); Allen Colverson & Tess Darwin (1760); Irene Tudor (1768); Elaine Pattison (1783); Kirsty Tudor (1763, 1755); Caren Gilbert (2114); Dr Nick Wilding (2211); Niall Hedderman (2272); C McLeod (2377); Anne Barclay (2422); Michael Tudor (3080); Marilyn Workman (3016); Lorna Henry (3332); Ruth Williams (3661); Ernest Crawford (728); Michael Lawrenson (1250); Rod Crawford (1291); David and Roslyn Blair (2567); Clare Davidson (1542); Falkland & Newton of Falkland Community Council (3657): seek removal of the greenfield site to the south of the site with the remainder of the site (brownfield land) developed for a mix of housing and light industry/commercial/cultural development.

Muir Homes (575) seek removal of site FAL001 from the settlement plan for Falkland.

Richard Gibb (471) – Site boundary should be modified with the remaining site developed for partial housing (20-30 units), light industrial and overflow carpark.

Raymond Kelly (647) – Reject extending the size of the site in the current proposal and seek some direct involvement with the community over any possible future for this site.

A A and J Brand (2085) – Removal of the allocation of Site FAL 001 from the Settlement Plan for Falkland and removal of the associated zoning on the Proposals Map for Falkland Settlement. This will enable a redistribution of the 100 units proposed to be allocated for this site to other more suitable sites in the same HMA. In that regard, my clients would propose that a proportion of those 100 units would be better re-allocated to their site (MIR Candidate Site Ref, AUC 004) on Land South of Low Road, Auchtermuchty. The justification as to how his clients’ site is more deliverable and preferable to this site in Falkland, more compliant with the Fife Plan Strategy and SPP Policy Principles, as well as setting out the site specific planning merits of their site, are provided for in a separate objection to the Auchtermuchty Settlement Plan in the Proposed Plan relating to the non-allocation of their site (MIR Candidate Site Ref AUC 004).
Alternative modification sought: Site FAL 001 could be identified as an “Opportunity Site” for future redevelopment potential, which may help provide the confidence needed to generate private sector interest to determine the viability of redeveloping the site.

Smith Anderson (1941): The wording of the site specific policy FAL001 is sought as follows:

“A development framework will be required for the site. Provision may be made for employment provision either by retaining land on the site not exceeding 0.5 hectares or alternatively making a contribution towards the provision of employment land in a more suitable location off site.”

SEPA (3403): none stated.

FREUCHIE

Sites (not in the Proposed FIFEplan) proposed by Objectors

Candidate Site LDP–FRE001- Bridgend

Lynch Homes (3711): Include a site for housing land at Bridgend, Freuchie.

Candidate Site LDP-FRE002 – West of Walter Lumsden Court

Dumbreck and Mitusch Family Heritable Interests (2054): Include a site for housing land at Walter Lumsden Court, Freuchie (Candidate Site LDP-FRE002).

Mr & Mrs Simpson (1171), James Eadie (1180), Neil Paterson (1218), Cy Crane (1224), Freuchie Community Council (1514, 1523), Angus Watt (1791, 1541), David McCulloch (1745), Chris Bell (2141), Mr & Mrs AB Cran (2368), David A Alexander (2375), Gordon Fyall (2383), Angie Pick (2518), Daniel Campbell (2732), Ian Cowie (2992), J Drummond (3024), Hugh Ward (3173), Karen Steele (3175), P A Steele (3663), D P Drummond (3666), Joan Allesone Cran (3668): No amendments to the Proposed FIFEplan position in respect of sites being offered for housing development at Bridgend and at Walter Lumsden Court, Freuchie.

LADYBANK

Ladybank Issues

David Grant (597) requests that the lands of Ladybank Bowling Club, and surroundings, not be designated as a Protected Open Space.

LAD001- Commercial Crescent

SEPA (3544) supports the inclusion of the site subject to requirements.

LAD002 – Cupar Road

David Grant (596) seeks that site LAD002 includes a new A92 roundabout south of Cairnfield.
LAD004 – The Road End, Loftybank

M Aitken (1877) - contends that the site is suitable for a greater number of “affordable houses” as an appropriate alternative to 6 detached houses and as such numbers can be increased.

Mr & Mrs J O’Neil (2399), SEPA (3545): none stated.

STRATHMIGLO

Sites (not in the Proposed FIFEplan) proposed by Objectors

Gladman Developments Ltd (2733): Include a site for housing land at East and West Back Dykes, Strathmiglo.
Robert Hopkins (1010) seeks the inclusion of land for housing at Bellfield, Strathmiglo.

COUNTRYSIDE AREA

LWD004 – Pitlair 2, Bow of Fife

SEPA (3260): request that the allocation is removed from the plan entirely.

LWD027 – Lower Melville Woods, Ladybank

Giffordtown & District Community Council (281): If permitted, the development requirements should include ample and effective advance screening from the A91 and A92.

Philip Hutchinson (902): the north-east boundary of this allocation should be trimmed back on the plan to correspond to the present boundaries on the ground. Any expansion into the field to the north east should be restricted to the addition of screen planting.

SEPA (3568): none stated.

Summary of responses (including reasons) by planning authority:

AUCHTERMUCHTY

AUC001 – East of Stratheden Place

Helen Bowman (1533), William Bowman (1545); SEPA (3305): Support for the FIFEplan position is noted.

AUC002 – Land West of Millflat

Principle of Development

Edward Link (40), Stewart Brown (181), Helen Bowman (1534), Heather Donaldson (1400), Jean Bell (1739), William Bowman (1543), Brian Slattery (1868), Alex Dewar (2286), Mary White (2234), Susan Carney (2401), Roy and Wendy Nicol (3108): Issues relating to the housing land requirement and the provision of an effective housing land
supply are dealt with Issue 2B Homes.

Any future development or expansion of the site would be subject to a future review of the Local Development Plan and/or submission of planning applications where regular and distinct stages of public consultation will occur.

Size and Location

Edward Link (40), Stewart Brown (181), Helen Bowman (1534), Heather Donaldson (1400), Jean Bell (1739), William Bowman (1543), Brian Slattery (1868), Alex Dewar (2286), Mary White (2234), Susan Carney (2401), Roy and Wendy Nicol (3108): The site has been allocated with an estimated capacity of 30 units; details of the design and layout would be addressed at the detailed planning application stage.

Transportation, Infrastructure and Services

Edward Link (40), Stewart Brown (181), Helen Bowman (1534), Heather Donaldson (1400), Jean Bell (1739), William Bowman (1543), Brian Slattery (1868), Alex Dewar (2286), Mary White (2234), Susan Carney (2401), Roy and Wendy Nicol (3108): Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife, Scottish Environment Protection Agency and Scottish Water, have been consulted throughout the Development Planning process. Where potential deficiencies in infrastructure have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision. Detailed matters, such as the specifications of road access, Flood Risk Assessment and drainage arrangements for example, are dealt with at planning application stage.

Economy

Edward Link (40), Stewart Brown (181), Helen Bowman (1534), Heather Donaldson (1400), Jean Bell (1739), William Bowman (1543), Brian Slattery (1868), Alex Dewar (2286), Mary White (2234), Susan Carney (2401), Roy and Wendy Nicol (3108): The Fife Employment Land Strategy (FELS) (CD18) approved by Fife Council in 2014 complements FIFEplan ensuring that Fife maintains adequate employment land across key settlements. It provides additional detail on employment sites including use classes.

Environment, Landscape, Townscape, Views and Character

Edward Link (40), Stewart Brown (181), Helen Bowman (1534), Heather Donaldson (1400), Jean Bell (1739), William Bowman (1543), Brian Slattery (1868), Alex Dewar (2286), Mary White (2234), Susan Carney (2401), Roy and Wendy Nicol (3108): Site assessments were conducted on all potential development sites before their inclusion in the Proposed Plan (CD15). These assessments were undertaken in accordance with Section 5(3) (a) of the Environmental Assessment (Scotland) Act 2005. The SEA Environmental Report assesses the potential significant environmental impact of implementing the policies and proposals contained within the Plan across a number of themes - this includes landscape. The Plan has therefore been assessed for the extent to which its policies protect valued landscape areas and more local features of value and how its proposals may change areas of relatively high landscape value.

Issues relating to the residential amenity of existing residents such as noise, privacy,
daylight etc. would be addressed at the detailed planning application stage. In this event, separate Local Development Plan policies on amenity (Policy 10) will help to protect existing amenity and assist the decision making process on planning applications.

**Miscellaneous**

Edward Link (40), Stewart Brown (181), Helen Bowman (1534), Heather Donaldson (1400), Jean Bell (1739), William Bowman (1543), Brian Slattery (1868), Alex Dewar (2286), Mary White (2234), Susan Carney (2401), Roy and Wendy Nicol (3108): Property value is not a material planning consideration.

Muir Homes (1845): Support for the FIFEplan position is noted.

**AUC003 – North of Old Station Road (Sterling Warehouse)**

SEPA (3306): Support for the FIFEplan position is noted.

Sites (not in the Proposed FIFEplan) proposed by Objectors

**Candidate Site LDP-AUC002 - Leckybank and Lochiebank Farms**

Muir Homes (1850), Helen Bowman (2231): The scale of the proposed development is inappropriate in terms of the character, scale and form of Auchtermuchty. However, a reduced area of this site was allocated (Site AUC002) as it was suitable for a limited number of houses (30) and sensitive design will integrate this with its surroundings.

**Candidate Site LDP-AUC001 – Land to South East of Auchtermuchty**

Tanner and Adamson (2029): Site assessments were conducted on all potential development sites before their inclusion in the Proposed Plan (CD15); candidate Site LDP-AUC001 was examined during this process and the decision taken not to allocate the site for development. Although Auchtermuchty is a settlement with a range of facilities, sufficient land has been allocated in Auchtermuchty and the wider Cupar Housing Market Area to provide supply over the short to medium term. The scale of proposed development on this site would not integrate well with Auchtermuchty in terms of its existing character, scale and form, would be highly visible and have an overall negative impact on the landscape setting of the town. It therefore remains Fife Council’s position that candidate site LDP-AUC001 should not be allocated for development at this time.

**Candidate site LDP- AUC004 – Land at Low Road**

A A and J Brand (2095): The development of this site would be visually prominent, would have a detrimental impact on the rural character and appearance of the area and would impact on views south to the Lomond Hills. The Reporter at the St. Andrews and East Fife Local Plan Examination specifically excluded this area from the adjacent site allocated in the St. Andrews & East Fife Local Plan for these reasons (see Core Document CD22 page 111). It therefore remains Fife Council’s position that candidate site LDP-AUC004 should not be allocated for development at this time.
FALKLAND

Falkland Issues

Richard Gibb (474): There are no current plans for an eastern village bypass for Falkland.

FAL001– St. John’s Works

Principle of Development

Susan Moody (29), Calum Beaton (61), Patricia Lessels (62), Jamie Robb (378), Scott Fraser-Collins (380), Richard Gibb (471), Rachel Fraser (651), Eilidh Hodgson (623), George Sinclair (600), Kevin Clapcott (643), Raymond Kelly (647), Amanda Ridings (1260), Roz Paton (1235), Heather Crawford (1262), Bruce Bennett (1380), Lisa Irving (1396, 1570), Colin Irving (2236), Rosemary McAllister (1402), Keith Jackson (1418), Tim Drew (1453), George McLuckie (1479), Stuart Haszeldine (1620), Aaron Marshall (1856), Robert Marshall (1846) (828), Aislinn Haszeldine (1800), Allen Colverson & Tess Darwin (1760), Irene Tudor (1768), Elaine Pattison (1783), Kirsty Tudor (1763, 1755), Caren Gilbert (2114), Dr Nick Wilding (2211), Niall Hedderman (2272), C McLeod (2377), Anne Barclay (2422), Michael Tudor (3080), Marilyn Workman (3016), Lorna Henry (3332), Ruth Williams (3661), Ernest Crawford (728), Michael Lawson (1250), Rod Crawford (1291), David and Roslyn Blair (2567), Muir Homes (575), Neil Brand (2085), Falkland & Newton of Falkland Community Council (3657): Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with in Issue 2B Homes.

Fife Council considers the re-use of previously developed land before development on greenfield sites, in line with Scottish Planning Policy 2014 (CD1). In order to conform to TAYplan Strategic Development Plan requirements (CD4), however, it has been necessary to include greenfield development sites in the Local Development Plan. Further, the provision of a mix of brownfield and greenfield sites is required to provide sufficient choice for the market to deliver the developments an area needs. In forming the settlement strategy for FIFEplan, whilst it is inevitable that some prime agricultural land will be used in allocating the land required to meet the TAYplan housing requirement, Fife Council has considered (through the site assessment process) the impact of the various options on prime quality agricultural land and has sought to minimise its loss.

This site is allocated in the Proposed Local Development Plan for employment/housing and could contribute 100 houses towards meeting the TAYplan housing land requirement. Sites allocated in the FIFEplan Local Development Plan will meet the tests of effectiveness as set out in Planning Advice Note 2/2010 Affordable Housing and Housing Land Audits (CD10). The site has good potential to integrate well with the town due to proximity to existing services. Development within the current footprint is likely to be well-screened by the existing built environment. A Transport Assessment is required to demonstrate no negative impact through redevelopment of site. There is potential for positive impact on human health and air quality through a decrease in movements of heavy goods vehicles through village. A Flood Risk Assessment is required.
Scale and Location, Landscape, Townscape, Views, Character, Environment and Amenity

Susan Moody (29), Calum Beaton (61), Patricia Lessels (62), Jamie Robb (378), Scott Fraser-Collins (380), Richard Gibb (471), Rachel Fraser (651), Eilidh Hodgson (623), George Sinclair (600), Kevin Clapcott (643), Raymond Kelly (647), Amanda Ridings (1260), Roz Paton (1235), Heather Crawford (1262), Bruce Bennett (1380), Lisa Irving (1396, 1570), Colin Irving (2236), Rosemary McAllister (1402), Keith Jackson (1418), Tim Drew (1453), George McLuckie (1479), Stuart Haszeldine (1620), Aaron Marshall (1856), Robert Marshall (1846, 828), Aislinn Haszeldine (1800), Allen Colverson & Tess Darwin (1760), Irene Tudor (1768), Elaine Pattison (1783), Kirsty Tudor (1763, 1755), Caren Gilbert (2114), Dr Nick Wilding (2211), Niall Hedderman (2272), C McLeod (2377), Anne Barclay (2422), Michael Tudor (3080), Marilyn Workman (3016), Lorna Henry (3332), Ruth Williams (3661), Ernest Crawford (728), Michael Lawrenson (1250), Rod Crawford (1291), David and Roslyn Blair (2567), Muir Homes (575), A A and J Brand (2085), Falkland & Newton of Falkland Community Council (3657): As discussed above, where possible, when identifying locations for new housing and other uses, Fife Council considers the re-use of previously developed land before development on greenfield sites, in line with Scottish Planning Policy (2014) (CD1). In order to conform to TAYplan Strategic Development Plan requirements (CD4), however, it has been necessary to include greenfield development sites in the Local Development Plan.

Site assessments were conducted on all potential development sites before their inclusion in the Proposed Plan (CD15). These assessments were undertaken in accordance with Section 5(3) (a) of the Environmental Assessment (Scotland) Act 2005. The SEA Environmental Report assesses the potential significant environmental impact of implementing the policies and proposals contained within the Plan across a number of themes - this includes landscape. The Plan has therefore been assessed for the extent to which its policies protect valued landscape areas and more local features of value and how its proposals may change areas of relatively high landscape value.

The Plan requires a Development Framework to be drawn up with 0.5ha of employment land to be retained. A sensitive development is required to respect the setting of the historic village. The Development Framework will be prepared consistent with the Development Plan strategy which will ensure the integration of new development with the existing structures and access arrangements on site, minimising impact through careful siting and design. Issues relating to the amenity of existing residents such as noise, nuisance, contamination, smell, privacy, daylight etc. would be addressed at the detailed planning application stage. In this event, separate Local Development Plan policies on amenity (Policy 10) will help to protect existing amenity and assist the decision making process on planning applications.

Transport, Infrastructure and Services

Susan Moody (29), Calum Beaton (61), Patricia Lessels (62), Jamie Robb (378), Scott Fraser-Collins (380), Richard Gibb (471), Rachel Fraser (651), Eilidh Hodgson (623), George Sinclair (600), Kevin Clapcott (643), Raymond Kelly (647), Amanda Ridings (1260), Roz Paton (1235), Heather Crawford (1262), Bruce Bennett (1380), Lisa Irving (1396, 1570), Colin Irving (2236), Rosemary McAllister (1402), Keith Jackson (1418), Tim Drew (1453), George McLuckie (1479), Stuart Haszeldine (1620), Aaron Marshall (1856), Robert Marshall (1846, 828), Aislinn Haszeldine (1800), Allen Colverson & Tess Darwin (1760), Irene Tudor (1768), Elaine Pattison (1783), Kirsty Tudor (1763, 1755),
All transport impacts from the development site will be identified and appraised through completion by the developers (for Fife Council approval) of a detailed Transport Assessment. The Transport Assessment will inform and support the submission of planning applications to Fife Council by development interests.

Economy

Susan Moody (29), Calum Beaton (61), Patricia Lessels (62), Jamie Robb (378), Scott Fraser-Collins (380), Richard Gibb (471), Rachel Fraser (651), Eilidh Hodgson (623), George Sinclair (600), Kevin Clapcott (643), Raymond Kelly (647), Amanda Ridings (1260), Roz Paton (1235), Heather Crawford (1262), Bruce Bennett (1380), Lisa Irving (1396, 1570), Colin Irving (2236), Rosemary McAllister (1402), Keith Jackson (1418), Tim Drew (1453), George McLuckie (1479), Stuart Haszeldine (1620), Aaron Marshall (1856), Robert Marshall (1846, 828), Aislinn Haszeldine (1800), Allen Colverson & Tess Darwin (1760), Irene Tudor (1768), Elaine Pattison (1783), Kirsty Tudor (1763, 1755), Caren Gilbert (2114), Nick Wilding (2211), Niall Hedderman (2272), C McLeod (2377), Anne Barclay (2422), Michael Tudor (3080), Marilyn Workman (3016), Lorna Henry (3332), Ruth Williams (3661), Ernest Crawford (728), Michael Lawrenson (1250), Rod Crawford (1291), David and Roslyn Blair (2567), Muir Homes (575), A A and J Brand (2085), Falkland & Newton of Falkland Community Council (3657): The Local Development Plan will be informed by an Employment Land Strategy (CD18) which aims to ensure the provision of land and infrastructure to attract jobs and inward investment. It is considered appropriate to seek an element of employment within any redevelopment proposal that may emerge for this site, as it is essential that opportunities are made available for local employment provision, thereby improving the sustainability of Fife’s communities.

Housing/Affordable Housing

Susan Moody (29), Calum Beaton (61), Patricia Lessels (62), Jamie Robb (378), Scott Fraser-Collins (380), Richard Gibb (471), Rachel Fraser (651), Eilidh Hodgson (623), George Sinclair (600), Kevin Clapcott (643), Raymond Kelly (647), Amanda Ridings (1260), Roz Paton (1235), Heather Crawford (1262), Bruce Bennett (1380), Lisa Irving (1396, 1570), Colin Irving (2236), Rosemary McAllister (1402), Keith Jackson (1418), Tim Drew (1453), George McLuckie (1479), Stuart Haszeldine (1620), Aaron Marshall (1856), Robert Marshall (1846, 828), Aislinn Haszeldine (1800), Allen Colverson & Tess Darwin (1760), Irene Tudor (1768), Elaine Pattison (1783), Kirsty Tudor (1763, 1755), Caren Gilbert (2114), Nick Wilding (2211), Niall Hedderman (2272), C McLeod (2377), Anne Barclay (2422), Michael Tudor (3080), Marilyn Workman (3016), Lorna Henry (3332), Ruth Williams (3661), Ernest Crawford (728), Michael Lawrenson (1250), Rod Crawford (1291), David and Roslyn Blair (2567), Muir Homes (575), A A and J Brand (2085), Falkland & Newton of Falkland Community Council (3657): The Local Development Plan will be informed by an Employment Land Strategy (CD18) which aims to ensure the provision of land and infrastructure to attract jobs and inward investment. It is considered appropriate to seek an element of employment within any redevelopment proposal that may emerge for this site, as it is essential that opportunities are made available for local employment provision, thereby improving the sustainability of Fife’s communities.
Caren Gilbert (2114), Dr Nick Wilding (2211), Niall Hedderman (2272), C McLeod (2377), Anne Barclay (2422), Michael Tudor (3080), Marilyn Workman (3016), Lorna Henry (3332), Ruth Williams (3661), Ernest Crawford (728), Michael Lawrenson (1250), Rod Crawford (1291), David and Roslyn Blair (2567), Muir Homes (575), A A and J Brand (2085), Falkland & Newton of Falkland Community Council (3657): In order to achieve mixed and balanced communities, mixed tenure developments will be promoted, for example, private, social rented housing, shared equity housing and low cost housing for sale. In line with Local Development Plan Policy 2: Homes, at least 20% of any new housing development in Falkland will be affordable housing.

Miscellaneous

Raymond Kelly (647), Heather Crawford (1262), Aislinn Haszeldine (1800): Issues relating to consultation of the proposed plan are dealt with separately under the Statement of Conformity.

Effectiveness of proposed sites

Muir Homes (575), A A and J Brand (2085): The sites allocated in the FIFEplan Local Development Plan will meet the tests of effectiveness as set out in Planning Advice Note 2/2010 Affordable Housing and Housing Land Audits.

FREUCHIE

Sites (not in the Proposed FIFEplan) proposed by Objectors

Candidate Sites LDP-FRE001 – Bridgend and LDP-FRE002 – West of Walter Lumsden Court

Lynch Homes (3711), Dumbreck and Mitsuoch Family Heritage Interests (2054), Mr & Mrs Simpson (1171), James Eadie (1180), Neil Paterson (1218), Cy Crane (1224), Freuchie Community Council (1514, 1523), Angus Watt (1791, 1541), David McCulloch (1745), Chris Bell (2141), Mr & Mrs AB Cran (2368), David A Alexander (2375), Gordon Fyall (2383), Angie Pick (2518), Daniel Campbell (2732), Ian Cowie (2992), J Drummond (3024), Hugh Ward (3173), Karen Steele (3175), P A Steele (3663), D P Drummond (3666), Joan A Cran (3668): The Proposed Local Development Plan allocates land for housing across the Cupar & NW Fife Housing Market Area, sufficient to meet housing land requirements. Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with in Issue 2B Homes. All sites identified for housing development in the Proposed Local Development Plan have been the subject of site assessments. At this time, there is no need to allocate, for housing, any of the sites which are the subject of these representations. It therefore remains Fife Council’s position that candidate sites LDP-FRE001 and LDP-FRE002 should not be allocated for development at this time.

LADYBANK

Ladybank Issues

David Grant (597): Amenity greenspace can be private and inaccessible. Fife Council considers that this site performs an important amenity function by dint of its open aspect and its relationship to the wider amenity offered by Victoria Park. It is appropriate that
the site should be retained, and identified, as Protected Open Space in recognition of its amenity value.

The protected open space designation depends on the role which the site plays with respect to the surrounding environment, not its ownership. It may well be the only such designated protected open space in Ladybank not in public ownership. That in itself does not alter its amenity value in the street scene. Scottish Planning Policy (CD1) encourages the retention of open space, stating that Planning should protect, enhance and promote green infrastructure, including open space and green networks, as an integral component of successful placemaking. Open space which is valued, functional or contributes to local amenity or biodiversity should be protected.

**LAD001 – Commercial Crescent**

SEPA (3544): Support for the FIFEplan position is noted.

**LAD002 – Cupar Road**

David Grant (596): The site has planning permission 05/02569/EFULL granted on 03/12/2007 (see Supporting Document SD3); work has begun on site and the consent implemented therefore works will be developed in line with that consent.

**LAD004 – The Road End, Loftybank**

M Aitken (1877), Mr & Mrs J O'Neill (2399): In order to achieve mixed and balanced communities, mixed tenure developments will be promoted, for example, private, social rented housing, shared equity housing and low cost housing for sale. However, given the scale of the proposed site there will be no requirement for the developer to provide affordable housing.

Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision. Detailed matters, such as the specifications of road access and drainage arrangements for example, will be dealt with at planning application stage.

SEPA (3545): Support for the FIFEplan position is noted.

**STRATHMIGLO**

Sites (not in the Proposed FIFEplan) proposed by Objectors

Gladman Developments Ltd (2733): The Proposed Local Development Plan allocates land for housing across the Cupar & NW Fife Housing Market Area, sufficient to meet housing land requirements. Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with in Issue 2B Homes. All sites identified for housing development in the Proposed Local Development Plan have been the subject of site assessments (CD15). At this time, there is no need to allocate, for housing, any of the sites which are the subject of these representations. It therefore
remains Fife Council’s position that this site should not be allocated for development at this time.

With regards to the supporting documents submitted by Gladmans, concerns have been raised by a member of the community over the lack of recognition of the location and presence of Old Station House to the proposed development. Attention has been drawn to the following factual errors which, at the request of the community member, should be taken into consideration when assessing the site for inclusion within the Plan:

- A proposed access route from the proposed site towards the north currently marked crossing Old Station House property. There is no existing access point in the property boundary, it is not a public right of way and it is erroneous to suggest a potential route across the property.
- The community woodland is inferred to run along the northern edge of the western side of the proposed site. This is in fact a full length Old Station House property boundary and is not a public green edge as is suggested.

Robert Hopkins (1010): Fife Council in preparing the Proposed Plan took the view that a proposal for housing, would not in principle be consistent with the FIFEplan strategy in a countryside location such as this. It was therefore decided not to include the site, to prevent potential inappropriate development in the countryside. This approach does not prevent the extant permission being implemented.

COUNTRYSIDE AREAS

LWD004 – Pitlair 2, Bow of Fife

SEPA (3260): The planning application referred to (13/03407FULL) (SD1 & SD2) sought to renew planning permission (08/01581/FULL) for the erection of 8 warden assisted dwellinghouses. The original planning application (02/01995/EFULL) was granted planning permission at appeal. The renewal of the consent was considered acceptable as there had been no material change in planning circumstances since the original permission was granted. In the case of the planning consent lapsing, any application to renew consent, or for a new planning application will not be supported due to the identified flood risk.

LWD027 – Lower Melville Woods, Ladybank

Giffordtown & District Community Council (281), Philip Hutchison (902): The allocation refers to an extension of the existing landfill and recycling centre for development of waste treatment options such as composting, materials recovery, energy recovery and anaerobic digestion. Detailed consideration of the layout, height and landform, together with assessment of the environmental health factors affecting site development, will be subject to local consultation as part of any planning application. Access to the site to be taken via the local road network.

SEPA (3568): Support for FIFEplan position is noted.
AUCHTERMUCHTY

AUC002 – Land west of Millflat

1. This greenfield site is situated to the west of Auchtermuchty outside the settlement envelope in the St Andrews and East Fife Local Plan – 2012. It is located between existing housing along Leckiebank Road to the west, Millflat to the east and High Road to the south. The site is currently in agricultural use and slopes up from High Road with further agricultural land to the north. I agree that the development of housing on the site would be a visible addition to this part of Auchtermuchty but the existing housing to the east, west and south would lessen this impact considerably. Views across the site to the open countryside beyond are already partially blocked from High Road by a high stone wall and housing on either side. The surrounding buildings enclose the site on 3 sides and there is a clear physical connection with the rest of the settlement. I am satisfied that a sensitively designed proposal could be integrated into its surroundings and would constitute a natural rounding off of the settlement. I do not regard the resultant impact on the character and setting of the village as unacceptable.

2. I have noted the concerns expressed about the impact of increased traffic on the surrounding roads and issues of road/pedestrian safety. From my site inspection I am aware of the reduced width of some of the surrounding roads and the extent of existing housing which already uses these roads including the proposed main access road, Lochiebank Crescent. However, the council has confirmed that their transportation service has been fully involved throughout the development planning process and I am satisfied that a solution could be found for a relatively modest development of 30 dwellings, which would not result in unacceptable impacts on the surrounding road network. The proposed plan requires the preparation of a transport statement as part of the development requirements for the site. This could consider traffic controls to prevent the unsafe use of Millflat, a recommended access point for construction traffic and take into account the location of the local play-park. Furthermore, I regard the proposed site as well located for pedestrian access to the facilities in Auchtermuchty centre which provides the opportunity for the use of alternative modes of transport to the car. The alleged problem with existing parking in the town does not alter my view.

3. Lack of adequate infrastructure and services in particular, sewage, drainage, school and health capacity are central to many of the representations. The council explains that external organisations such as NHS Fife, the Scottish Environment Protection Agency and Scottish Water as well as their internal education service have been consulted as part of the preparation of the proposed plan. Where potential deficiencies in infrastructure have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of local plan allocations while in others, there will be “on demand” provision or upgrades to existing provision. Policy 3 (Infrastructure and services) and Policy 4 (Planning obligations) seek to ensure that the required levels of infrastructure are delivered. I note that a drainage impact assessment will be required as part of any development proposal. Taking all of this into account, I have no reason to believe that appropriate provision could not be made.

4. Reference is made to a lack of employment opportunities and to the closure of existing businesses. However, there are 2 existing employment sites located to the
south of the town and the council has allocated a further 1 hectare site for business, general industrial, storage and distribution uses north of Old Station (AUC 003) in the proposed plan. This provides the opportunity for a sustainable mix of development. I do not accept that a lack of employment opportunities would justify the non-allocation of this housing site.

5. With regard to possible adverse impacts on the natural and built environment, the site is not identified as prime agricultural land and carries no formal nature conservation designation. No objections have been submitted from statutory bodies such as Scottish Natural Heritage or Historic Environment Scotland. The development requirements for the site include that no development should be within 10 metres of the boundary trees/hedgerows. Additional safeguards for natural and built heritage assets are provided by Policy 13 (Natural Environment and Access) and Policy 14 (Built and Historic Environment).

6. The housing requirements for this area of Fife are set out in the TAYplan Strategic Development Plan. In order to satisfy these housing requirements, it has been necessary for the council to allocate both greenfield and brownfield sites in those settlements with adequate facilities to accommodate additional development. I agree that Auchtermuchty has facilities commensurate with the level of housing proposed and that additional housing could further support/enhance the vitality and viability of the local services and infrastructure currently available. I also acknowledge that the site is in control of a house builder who has confirmed that the site is deliverable.

7. I consider the proposed site to be a small local building development in terms of scale, although it is proposed by a mainstream house-builder. The designation of the site purely for single plots for the self-builder would be outside my remit. Although I acknowledge that noise/air pollution may increase to some degree particularly during construction, such impacts are inevitable for those living close to any housing or other development. Given the size of the site, and the temporary nature of the construction phase, I do not envisage that the resulting impacts on amenity would be unacceptably adverse particularly as they can be minimised through planning conditions at the planning application stage. In accordance with standard planning procedure, loss of outlook and devaluation of properties in the area are not matters which I am able to take into account in assessing the land-use implications of the proposal.

8. Finally, I deal with candidate site LDP-AUC002 and the proposals to allocate extended sites at this location (candidate site LDP-AUC002 – Leckybank and Lochiebank Farms) below.

9. I conclude that no change to the proposed plan is required. Matters of detail such as clarification of the development distances from boundary trees/hedgerows and the stone wall are a matter for the council and would not alter my overall conclusion.

Candidate site LDP-AUC002 – Leckybank and Lochiebank Farms

10 I acknowledge that there is a shortfall in meeting the housing land requirement in the SESplan area of Fife together with the uncertainties expressed with regard to the level of that shortfall under Issue 2b Homes. However, the conclusions find that adequate housing land has been provided in the TAYplan area in line with the requirements set out in the strategic development plan. In addition the 2015 Housing Land Audit has found that there is a 5-year effective housing land supply in the Cupar...
and North West Fife and St Andrews and North East Fife Housing Market Areas. Accordingly there is no strategic numerical justification to allocate further sites for housing within the TAYplan area.

11 Two alternative options are put forward by the representor (Muir Homes), the entire candidate site for up to 120 dwellings (9 hectares) and a smaller site for up to 50 dwellings. Muir Homes has also submitted representations supporting the adjacent site which is allocated in the proposed plan for 30 dwellings (AUC002 – Land west of Milflat). Both alternatives would include site AUC002. The extended sites are considered preferable by Muir Homes to the smaller proposed allocation.

12. Both of the extended sites are currently in agricultural use and lie beyond site AUC002 to the north and west of Auchtermuchty. They are located outside the settlement envelope in the St Andrews and East Fife Local Plan. On my site inspection I noted that the proposed allocation AUC002 which ends just beyond Lochiebank Crescent is very much enclosed by surrounding dwellings and has a clear physical connection with the rest of the settlement. As a result, I am satisfied that development on this greenfield site would constitute a natural rounding off of the settlement and could be designed to be fully integrated with and form a natural extension rather than being an obvious addition to it.

13 The proposed site for 50 dwellings would involve development extending just beyond The Riggs to the north. After Lochiebank Crescent the site slopes upwards and then downwards towards The Riggs. Although there is built development on either side, the topography and the single storey dwellings to the east combine to give this part of the site a much less enclosed character. In contrast to the West of Milflats site, instead of integrating with the physical form and being an obvious part of the settlement, its character is one of open countryside on the edge of the settlement. Development of this extended site would not result in a natural rounding off of the town but rather an extension of the settlement into the surrounding open countryside. The site’s identification by the council as a “reasonable alternative” does not change my opinion.

14. Candidate site LDP-AUC 002, for 120 dwellings, would extend the developed area of the town even further, as far north as Mournipea with existing built development to the east and open countryside to the west. Development would extend into a significant area of open countryside to the north-west of the town and, particularly on the upper slopes, have a visible impact on its landscape setting. The proposed development would be a very obvious addition to the form of the settlement extending built development to the north and west.

15. I have considered the various supporting information submitted with regard to landscape and visual impact, transport/access, water/drainage capacity, education capacity and the Indicative Masterplan for the site which proposes areas of public open space and landscaping provision (including allotments). I also note the updated information provided from both the council and Muir Homes following my further information requests FIR 37 and FIR 100. Further information request FIR 100 asked for a comparison of the merits of site AUC002, the reduced version of candidate site LDP-AUC002 and the larger candidate site. The response includes comments from Scottish Water, the Scottish Environment Protection Agency and the transport section of the council and opposing arguments from the council and Muir Homes with regard to the appropriate scale of development during the plan period for a town of this size.
There were no objections to the extended sites from the consultees, subject to various conditions, although Scottish Water responded to say that foul wastewater treatment capacity is not available to accommodate more than the 30 units proposed by the council. Muir Homes has replied that water and drainage network upgrades are a common factor with all new developments and that any mitigation works required to either system would be implemented by the developer, at their cost.

Nevertheless and even where all infrastructure constraints could be overcome, I am not convinced that there is sufficient justification for a further extension of the settlement envelope into open countryside at this location, given the lack of any wider need for the allocation of additional housing sites in the TAYplan area. The need for affordable housing, the contention that larger housing sites are allocated in other smaller settlements in Fife and the improvements to the vitality of existing businesses and facilities which it is argued would occur as a result of an increase in housing numbers do not alter my view.

I find above (paragraphs 1 to 9) that the proposed allocation of site AUC002 for 30 dwellings is appropriate and should remain in the plan. This site can be delivered without the need to extend the allocation further. I am also aware of the other allocation (AUC001) for 18 dwellings in the town. Despite the identification of the town as a “preferred settlement”, the lack of progress on site AUC001 and the findings of the previous examination report, I am not persuaded of the need for a further 20 or 90 dwellings in Auchtermuchty during this plan period.

Taking all of the information submitted into account and regardless of the effectiveness of the sites, their non-prime agricultural land identification and the suggested potential for the larger site to soften the existing settlement edge, I conclude that the proposed plan should remain unchanged.

Sites in Falkland are dealt with below. The Cупar North Strategic Development Area is dealt with at Issue 17 and sites in Newburgh at Issue 19.

The representation with regard to the submission of additional documents is noted but does not change my conclusions above.

Candidate site LDP-AUC001 – Land to south east of Auchtermuchty

I acknowledge that there is a shortfall in meeting the housing land requirement in the SESplan area of Fife together with the uncertainties expressed with regard to the level of that shortfall under Issue 2b Homes. However, the conclusions find that adequate housing land has been provided in the TAYplan area in line with the requirements set out in the strategic development plan. In addition the 2015 Housing Land Audit has found that there is a 5-year effective housing land supply in the Cupar and North West Fife and St Andrews and North East Fife Housing Market Areas. Accordingly there is no strategic numerical justification to allocate further sites for housing within the TAYplan area.

The site assessment provided by the council refers to a site of 13.47 hectares for between 150 and 180 houses. However, the representation submitted with the proposed plan relates to a significantly reduced site of 2.73 hectares for 50 dwellings. Following clarification through my further information requests FIR 102 and FIR 102b, the council has now commented on the suitability of the reduced site as a housing
PROPOSED FIFE LOCAL DEVELOPMENT PLAN

allocation. While recognising that the reduced site was not submitted for consideration at the Main Issues Report stage, for completeness, I deal with both sites below.

24. The 2.73 hectare greenfield site is located to the east of Auchtermuchty and is outside but adjacent to the settlement envelope in the St Andrews and East Fife Local Plan. There is existing housing to the north and west. The site is part of an agricultural field with no natural boundary to the east. There are extensive views across the site to the open countryside beyond when entering or leaving Auchtermuchty along the A91.

25. The expansive open views across the site give this area a rural character despite the existing housing to the north. Development of the site for 50 houses together with the associated access onto the A91 would urbanise the character of this part of the town extending built development into open countryside to the south and east along the A91. I agree with the council that the proposed development would have a negative impact on the landscape setting of the town and on the extensive flat, open landscape character of the Howe of Fife. I am aware that the site is at a lower level than the road and that extensive structural tree planting is proposed along the open eastern and southern edges of the site. Nevertheless, I am not convinced that this would reduce the visibility of the proposed development or its impact on the character of the area to an acceptable degree.

26. I note that the Scottish Environment Protection Agency and Scottish Water do not have any objections to the development of the site for housing. I also acknowledge the concerns expressed by the council’s internal transportation section about access options to the site and their assessment that the support or not of this development will be very much dependant on whether acceptable visibility splays can be achieved and whether suitable pedestrian facilities can be provided. The representor considers that both acceptable visibility splays and suitable pedestrian links can be provided for the site and argues that, in addition, a safe new access for existing residents from Bow Road would be provided.

27. I find above (paragraphs 1 to 9) that the proposed allocation of site AUC002 for 30 dwellings is appropriate and should remain in the plan. I am also aware of the other allocation (AUC001) for 18 dwellings in the town. I, therefore, do not agree that the growth of the village is being restricted unnecessarily. I have noted the references to the lack of progress on the Cupar North Strategic Development Area (dealt with in Issue 17) and the findings of the previous examination report but I am not persuaded of the need for a further 50 dwellings in Auchtermuchty during this plan period.

28. Taking all of the above into account and regardless of whether acceptable access arrangements can be achieved, given the lack of need for additional housing land in the TAYplan area, I conclude that there is insufficient justification for the proposed extension of Auchtermuchty at this location. The site’s effectiveness, its accessibility to public transport, the potential to balance the urban form at this eastern entry to the settlement or the offer to provide significant additional open space/greenspace and use local building materials as part of any residential development do not alter my view.

29. The larger 13.5 hectare site (6.04 hectares according to updated information from the council) is also currently in agricultural use. It is located to the south-east of the town and outside the settlement envelope in the St Andrews and East Fife Local Plan. The larger site overlaps with the south of the reduced site and there is existing housing to the north and west with employment land and a cemetery to the south. The site extends into
open countryside to the east.

30. The development of the site for 150-180 dwellings would represent a major development in terms of the existing size and level of facilities available in Auchtermuchty and significantly extend the settlement to the south-east into open countryside. The proposed plan already allocates sites for 48 houses in the town and I agree with the council that the addition of a further 150-180 houses would be unlikely to fit in with the existing character, scale and form of the settlement. From my site inspection I also noted the lack of readily available access points to easily integrate a development of this scale with the rest of the town.

31. In response to my further information request FIR 102 the Scottish Environment Protection Agency notes that this larger site is now within the updated fluvial Flood Maps and refers again to the 3 regulated sites in the vicinity and the potential for co-location odour nuisance issues with the Scottish Water Treatment works.

32. Given the above and in particular the provision of adequate new housing sites elsewhere to meet the strategic housing needs of the TAYplan area, I conclude that the large scale expansion of Auchtermuchty at this location is not currently justified. The additional information submitted with regard to land ownership does not change my conclusions.

33. Overall, no amendment to the proposed plan is required.

**Candidate site LDP-AUC004 – Land at Low Road**

34. I acknowledge that there is a shortfall in meeting the housing land requirement in the SESplan area of Fife together with the uncertainties expressed with regard to the level of that shortfall under Issue 2b Homes. However, the conclusions find that adequate housing land has been provided in the TAYplan area in line with the requirements set out in the strategic development plan. In addition the 2015 Housing Land Audit has found that there is a 5-year effective housing land supply in the Cupar and North West Fife and St Andrews and North East Fife Housing Market Areas. Accordingly there is no strategic numerical justification to allocate further sites for housing within the TAYplan area.

35. This greenfield site is located to the south of Auchtermuchty outside the settlement envelope in the St Andrews and East Fife Local Plan. It is currently in agricultural use and bounded by existing housing to the east and north across Low Road; a garage and housing site AUC001 – East of Stratheden Place (allocated for 18 houses) to the west; and open countryside to the south. Expansive open views across the site provide one of the few remaining unobstructed views of the Lomond Hills from Low Road when entering or leaving Auchtermuchty. I agree that these views are an important aspect of the rural character and appearance of this part of Auchtermuchty and provide an important connection with the landscape setting of the town. Views across the allocated housing site AUC001 are already blocked by a row of built development along Low Road.

36. I have noted the argument that this would be a gap/infill site compatible with development on either side and the concept plans submitted attempting to illustrate how the visual impact of the development of this site could be reduced and a defensible settlement boundary created. However, I am not convinced that the proposed 30 houses could be accommodated on the 1.2 hectare site without a significant visual and...
landscape effect. Notwithstanding its location adjacent to the settlement boundary, the proposed development would contravene one of the 6 qualities of successful place listed in Scottish Planning Policy “distinctiveness” in that it would not complement local features such as the landscape and would have an adverse impact on the rural and open sense of identity of this part of the town. The loss of private views from the 3 residential properties on the north side of Low Road has not been material to my considerations.

37. The assertion that the allocation of a larger site for 50 dwellings would make the adjacent allocation for 18 dwellings (AUC001) more marketable, would not outweigh the resultant adverse impacts.

38. Taking all of the above into account, I do not consider that the proposed development of this site is justified. The potential for the site to integrate reasonably well with and support existing facilities in Auchtermuchty, its accessibility to public transport, the lack of sensitive natural heritage designations, the site’s overall effectiveness and the various other supporting information provided by the promoter of the site, do not alter my view. I conclude that no change to the proposed plan is required.

39. Site NEB001 is dealt with in Issue 19 and site FAL001 is dealt with below.

FALKLAND

Falkland issues

40. The strategy for the Cupar and Howe part of Fife concentrates development within the Cupar North Strategic Development Area as supported by the strategic development plan for the area, TAYplan. Development in the Strategic Development Area is linked to the provision of a relief road and other key infrastructure to support the future needs of the town. The strategy for the wider area, which includes Falkland, is to provide opportunities for additional small and medium scale development which would complement the existing Strategic Development Area allocation. The development proposed for Falkland in the proposed plan is also related to the availability of existing services and the ability of the settlement to accommodate the scale proposed.

41. Following my further information request FIR 38, the council while accepting that the principle of a bypass is acceptable, state that a feasibility study would be required to determine if a satisfactory road design could be achieved. Furthermore, that any such road would have to be developer funded and would therefore require significant associated development.

42. While I recognise that there is a shortfall in meeting the housing land requirement in the SESplan area of Fife together with the uncertainties expressed with regard to the level of that shortfall under Issue 2b Homes, the conclusions find that adequate housing land has been provided in the TAYplan area in line with the requirements set out in the strategic development plan. In addition the 2015 Housing Land Audit has found that there is a 5-year effective housing land supply in the Cupar and North West Fife Housing Market Area. Accordingly there is no strategic numerical justification to allocate further sites for housing within Falkland over and above those already allocated. I am also unaware of any need for substantial employment development in the village.

43. Therefore, although I acknowledge the argument that an eastern bypass could be
part of a long term solution to traffic problems and housing need in Falkland, given the uncertainties with regard to its feasibility and funding, I conclude that no change to the proposed plan is required. This matter could be considered again during the preparation of the next local development plan for the area.

FAL001 – St John’s Works

44. The northern part of this site (2.2 hectares) is currently allocated for employment use in the St Andrews and East Fife Local Plan and was the location of a packaging factory. The text of the local plan states that in the event that the company wished to relocate to more modern premises elsewhere, a mixed employment and housing development might be considered where this accords with development plan policies and the council is convinced that such development is vital to the company’s relocation. Discussions between the owners of the site and the council have taken place since then and a new site for the company was purchased in 2012. The council has confirmed in further information request FIR 39, that the site was operational until recently and I noted on my site inspection that the buildings on the site appeared to be vacant.

45. The existing employment site together with additional greenfield land to the south has been promoted by the site owners through the proposed plan preparation process with residential as their preferred use while recognising that some element of employment space might also be required. The additional greenfield land is covered by a Local Landscape Area designation in the local plan and is outside the settlement envelope. However, the reporter in the previous local plan examination stated that there was no reason for a proposal not to incorporate the remainder of the adjacent land holding and recommended an indicative “Other proposals” annotation should be added to the area south of the St John Works. The preparation of a new local development plan allows the council to reassess allocations in existing local plans. The council has consequently extended the site southwards to cover the area annotated as “Other proposals” in the existing local plan. This 3.7 hectare site is allocated for employment/housing. It is estimated to have capacity for 100 houses and 0.5 hectares of employment land is to be retained.

46. Many representations, while welcoming the redevelopment of the existing employment site, object to the extension onto the greenfield land to the south. I am aware that development on this part of the site, which rises steeply southwards, would have some impact on the setting of the village. However, the existing factory buildings which include a tall chimney are several storeys in height and are already highly visible in views from various locations both within and outside the village. I am not convinced that the addition of housing development on the area behind the existing buildings would have a more substantial impact on the setting of Falkland. I also note that one of the development requirements for the site refers to avoiding development on the higher north facing slope and the establishment of a strong landscape edge at the southern boundary. In addition, reference is made to the need for sensitive development to respect the setting of the historic village and provide a high quality landscape and access link into the Lomond Hills Regional Park. These requirements would help to minimise the impact on the landscape setting in views south, reflect the existing woodland edge to the west and retain access to the Lomond Hills.

47. Concerns are also expressed about the impact of a development of this scale on the unique historic character of the village, its conservation area and its tourist trade. The housing requirements for this area of Fife are set out in the TAYplan Strategic
Development Plan. In order to satisfy these housing requirements, it has been necessary for the council to allocate both greenfield and brownfield sites in those settlements with adequate facilities to accommodate additional development. I am satisfied that Falkland has the necessary facilities to accommodate some new development during the plan period. However, I accept that the provision of 100 new houses would inevitably have an impact on the character of a settlement of this size. A development framework is required to be prepared for the site. (I note from further information request FIR 39 that the historical requirement to prepare a brief for council approval has not been executed, partly due to the site being operational until recently). Such design tools can improve the quality of development and promote positive change. The opportunity exists to redevelop what is a deteriorating, redundant employment site as a modern and sympathetic addition to this historic village. In addition, the closure of the packaging factory has removed the need for the associated HGV vehicular movements from the village which should have a positive impact on its historic character.

48. On balance, I am satisfied that a sensitively designed and located development could be satisfactorily accommodated on this site without unacceptable adverse impacts on either the character or setting of Falkland or its conservation area. The proposed density of the development does not alter my view. Given the unique nature of the site involving the redevelopment of a vacant employment area, I do not accept that it would set a precedent for further development. As a result of the sensitivity of the site, I do, however, find that reference to the involvement of the local community in the preparation of the required development framework, should be added as a development requirement to the proposed plan.

49. Many representations refer to the increase in car usage which would be associated with the proposed 100 houses. I am aware, from my site inspection, of the narrow roads surrounding the site and the absence of footpaths. Nevertheless, the council has confirmed that their transportation service has been fully involved throughout the development planning process and the submission of a transport assessment is one of the development requirements for the site. This would consider the impacts on Wellbrae and the surrounding road network as well as pedestrian access and compare the traffic generated by the vacant factory to that of the new housing. I must also take into account the proximity of the site to the facilities of the village and bus stops with the consequent opportunity for residents to use other alternatives modes of transport to the car. I am not persuaded that, subject to the requirement for a transport assessment, the impacts on the surrounding road network would warrant the deletion of this site.

50. Lack of adequate infrastructure and services in particular, sewage, drainage, school and health capacity is also argued in representations. The council explains that external organisations such as NHS Fife, the Scottish Environment Protection Agency and Scottish Water as well as their internal education service have been consulted as part of the preparation of the proposed plan. Where potential deficiencies in infrastructure have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of local plan allocations while in others, there will be “on demand” provision or upgrades to existing provision. Furthermore, Policy 3 (Infrastructure and services) and Policy 4 (Planning obligations) seek to ensure that the required levels of infrastructure are delivered. I note that a flood assessment will be required as part of any development proposal. Taking all of this into account, I have no reason to believe that appropriate provision could not be made.
51. It is argued that there would be an unacceptable impact on the amenity of neighbouring residents due to various issues including air/noise pollution and loss of daylight. Unfortunately some adverse impacts are inevitable for those living close to a new development. These impacts can be minimised through planning conditions at the planning application stage and Policy 10 (Amenity) provides additional safeguards to prevent a significant detrimental impact on amenity. Given these safeguards, the suggested impacts on amenity would not justify the deletion of this site from the proposed plan. In accordance with standard planning procedure, loss of outlook is not a matter which I am able to take into account in assessing the land-use implications of the proposal.

52. With regard to possible adverse impacts on the natural environment and wildlife, the site carries no formal nature conservation designation. No objections have been submitted from statutory bodies such as Scottish Natural Heritage. The development requirements for the site include that no development should be within 10 metres of the identified woodland habitat to the south-west of the site. Furthermore, additional safeguards for natural and built heritage assets are provided by Policy 13 (Natural Environment and Access) and Policy 14 (Built and Historic Environment).

53. I have noted the concerns expressed about the need for further affordable housing rather than open market housing in Falkland. As I have stated above, the proposed plan must provide adequate open market housing to satisfy the requirements of the strategic development plan. Furthermore, no detail has been provided with regard to the commercial viability or otherwise of the development of this site for affordable housing only or for a higher percentage of affordable housing. In any event, in accordance with Policy 2 (Homes), 20 percent of the houses on the site would be required to be affordable. I am not convinced that a higher level of provision would be justified.

54. I also acknowledge the representations stating that the area of employment land would reduce significantly in the proposal while others refer to a lack of small employment units/flexible workspace as one of the challenges facing Falkland. The site is currently vacant and occupied by large, industrial buildings which are in a poor state of repair. The viability of their re-use for employment would seem unlikely. The redevelopment of the site provides the opportunity not only for the provision of housing to satisfy the strategic housing land requirements but also for the provision of smaller employment units which could satisfy some of the local employment need identified. In these circumstances, I consider that the loss of some employment land is justified. I do not agree with the owners of the site that the requirement for 0.5 hectares of employment land on-site is unduly onerous. Scottish Planning Policy encourages the use of land for mixed uses and given the previous use of this site, I regard the retention of at least 0.5 hectares of employment land as essential.

55. Use of part of the site for various alternative uses including public car parking or commercial/cultural development/community uses has been suggested but I have no clear evidence to justify the identification of these uses on the site. Matters of detail such as the identification of recreational land as part of the housing development would be dealt with as part of the planning application process.

56. The effectiveness/deliverability of the site is questioned due to the range of large buildings which would have to be removed from part of the site, the topography of the site, the enhanced design which would be required and alleged residual contamination issues. The council responds that all sites in the local development plan meet the tests
of effectiveness as set out in Planning Advice Note 2/2010 Affordable Housing and Housing Land Audits. Scottish Planning Policy is clear in promoting the re-use or re-development of brownfield land before new development takes place on greenfield sites (paragraph 40). Inevitably the redevelopment of brownfield land will often involve additional costs over greenfield sites due to the presence of existing buildings and possible contamination issues. This does not mean that all brownfield sites should be considered as ineffective.

57. This site would involve the development of both brownfield and greenfield land which could cross subsidise any costs involved. The evidence submitted does not allow me to reasonably conclude that the constraints alluded to or any other infrastructure constraints are insurmountable. As noted above, the site is now vacant and the owners have said that marketing would commence as soon as they had relocated. No-one has argued that Falkland is not a marketable location and the apparent absence of a lead developer does not mean that a developer will not be found. This site is not one of the disputed sites in the 2015 Housing Land Audit. I, therefore, agree with the council that the site is effective and as such should be identified as an employment/housing site rather than an opportunity site or windfall site. Finally, I do not consider that the allocation of this site for 100 houses and employment land would unacceptably detract from the certainty of developing the Cupar North Strategic Development Area (1400 houses) given its relatively small size.

58 In conclusion, I find that any possible adverse impacts identified above are outweighed by the need to satisfy the strategic development plan housing requirements and the regeneration opportunity to redevelop a vacant, brownfield employment site for a mix of uses. (Scottish Planning Policy encourages the use of land within or adjacent to settlements for a mix of uses – paragraph 40). I am satisfied that the removal of part of the site from the Local Landscape Area, the amendment of the settlement envelope and the allocation of a larger site for employment/housing uses is justified. No change to the proposed plan is required. The potential or otherwise for an eastern village bypass would not alter my overall conclusion.

59. Issues relating to the consultation on the proposed plan are dealt with under Issue 1 (General comments).

FREUCHIE

Candidate site LDP-FRE001 – Bridgend

60. I acknowledge that there is a shortfall in meeting the housing land requirement in the SESplan area of Fife together with the uncertainties expressed with regard to the level of that shortfall under Issue 2b Homes. However, the conclusions find that adequate housing land has been provided in the TAYplan area in line with the requirements set out in the strategic development plan. In addition the 2015 Housing Land Audit has found that there is a 5-year effective housing land supply in the Cupar and North West Fife and St Andrews and North East Fife Housing Market Areas. Accordingly there is no strategic numerical justification to allocate further sites for housing within the TAYplan area.

61. This 3.8 hectare site is located to the north of Freuchie outside the settlement envelope in the St Andrews and East Fife Local Plan and is currently in agricultural use. The A92 lies to the east of the site with Bridgend Services and a garden centre beyond;
an area of greenspace and a property on Eden Valley Gardens to the west; housing to the south; a row of houses along Eden Valley Gardens to the north west and open countryside to the north-east. Freuchie Burn runs along the northern perimeter of the site.

62. The site is highly visible when passing Freuchie on the A92 or entering Freuchie from the east and provides extensive views across the site towards the Lomond Hills to the west and open countryside to the north. I agree with the council that it provides an attractive landscape setting for the village and is part of an important green wedge which extends into its centre. Despite the design elements proposed by Lynch Homes, including a landscape edge along the A92 incorporating an acoustic bund and an area of open space, I am not convinced that a development for approximately 60 houses, together with associated facilities, could be developed on the site without an adverse impact on the rural character and appearance of this north-eastern edge of Freuchie. I do not accept that the existing landscape has the capacity to accommodate a development of this scale without impinging on its landscape setting.

63. Although partially adjacent to the settlement boundary, the proposal would not demonstrate the “distinctive” quality of a successful place set out in Scottish Planning Policy, in that it would not complement the local landscape and would detract from the rural and open sense of identity of this part of Freuchie.

64. Taking all of the above into consideration I do not regard the resultant adverse impact on the landscape setting of Freuchie to be justified. The proposed provision of open space, 15 affordable homes and a multi-use games area would not outweigh the adverse impact. I conclude that the site should not be allocated for housing in the proposed plan. I have noted the arguments advanced with regard to the proposal’s sustainable location, lack of infrastructure constraints, overall effectiveness and potential contribution to job creation/the support of local services, but these do not alter my conclusion.

Candidate site LDP-FRE002 – West of Walter Lumsden Court

65. I acknowledge that there is a shortfall in meeting the housing land requirement in the SESplan area of Fife together with the uncertainties expressed with regard to the level of that shortfall under Issue 2b Homes. However, the conclusions find that adequate housing land has been provided in the TAYplan area in line with the requirements set out in the strategic development plan. In addition the 2015 Housing Land Audit has found that there is a 5-year effective housing land supply in both the Cupar and North West Fife and St Andrews and North East Fife Housing Market Areas. Accordingly there is no strategic numerical justification to allocate further sites for housing within the TAYplan area. The deletion of site FAL002 (for 32 houses) from the proposed plan at Fife’s Executive Committee meeting on 9 September 2014 does not alter this fact.

66. This 1.2 hectare greenfield site is located to the north of Freuchie and outside the settlement envelope in the St Andrews and East Fife Local Plan. It is bounded by existing housing to the east, west and south with Freuchie Burn and open countryside beyond, to the north. I accept that the development of the site for 20-25 houses would constitute a rounding off of the village envelope and would have minimal impact on the surrounding landscape. Furthermore, I note that following my further information request FIR 40, the council now considers that “the possibility of a second access to the north,
may go some way to resolving concerns raised in the original assessment of the site”. Nevertheless, the council reiterates the point that even with this improved access, the site would not integrate particularly well with the rest of the village as there are no additional pedestrian/cyclist links to adjacent streets.

67. I am also aware of the representations submitted which object to any further development in Freuchie and refer to the site’s identification as prime agricultural land, the risk of flooding, the perceived pressures on the village infrastructure and road safety concerns. In contrast, the promoter of the site contends that the absence of any housing development opportunities restricts the growth of the village unnecessarily and that the modest increase in housing numbers proposed would help to sustain the local community and would support existing local services and facilities. An indicative layout shows a 10 metre buffer between the burn and the rear gardens of the proposed houses and although it is argued the proposed site has never flooded, the need for a detailed flood risk assessment is accepted.

68. In conclusion and taking all of the information submitted into account, I find that even where the remaining concerns of the council and representors could be overcome, given the lack of any wider need for the allocation of additional housing sites in the TAYplan area there is insufficient justification to allocate what is a greenfield site outwith the settlement envelope, whatever its size. No change to the proposed plan is, therefore, required. The inclusion in the proposed plan of a, part brownfield, housing site in the nearby village of Falkland does not alter my view (see paragraphs 44 to 59 above).

69. The Cupar North Strategic Development Area is dealt with in Issue 17.

LADYBANK

Ladybank issues

70. This area of designated open space covers both Ladybank Bowling Club and the adjacent Victoria Park. Its designation as protected open space is a continuation of its designation in the St Andrews and East Fife Local Plan. Planning Advice Note 65 – Planning and open space recognises that public parks and gardens and sports areas such as bowling greens can be appropriately designated as types of open space, whether they are publically or privately owned. All spaces, regardless of ownership and accessibility contribute to the amenity and character of an area. An area does not have to be “open” to be designated as “open space”.

71. On my site inspection, I noted that the bowling club was well maintained and appeared to be well used. Well managed and maintained open spaces can create opportunities for all sections of the community to interact. They provide opportunities for sport and recreation and help to promote active and healthy lifestyles. The importance of protecting, enhancing and promoting green infrastructure such as open space is recognised in Scottish Planning Policy (paragraph 220). I agree with the council that this area of open space performs an important amenity function for the settlement and conclude that the site should continue to be protected as open space in the proposed plan. While noting the concern that other bowling clubs have not been designated as open space, this does not alter my conclusion that the designation of this area is justified and should remain.
LAD002 – Cupar Road

72. I am aware that planning permission for 57 dwellings (including 6 affordable houses) and an access road was approved for this site on 3 December 2007 (05/02569/EFULL). On my site inspection, I noted that work has commenced. The preparation of the local development plan has been overtaken by the development management process. The development of site LAD002 cannot, therefore, be tied to the provision of a new roundabout just south of Cairnfield and the other road improvements as suggested in the submitted drawing.

73. Following my further information request FIR 41, the council has stated that both junctions serving Ladybank onto the A92 would benefit from improvement and that the stopping up of the north junction and construction of a roundabout to the south would be welcomed, subject to the comments of Transport Scotland. Although these potential improvements cannot be identified in this version of the local development plan, they could be considered again as part of the future development of Ladybank in the preparation of the next local development plan. Comments both for and against the proposals would be assessed at that time.

74. I conclude that no change to the proposed plan is necessary.

LAD004 – The Road End, Loftybank

75. This greenfield site is located to the west of Ladybank outside the settlement envelope in the St Andrews and East Fife Local Plan. There is existing housing to the east. It is argued that there would be a lack of adequate drainage for housing development on this site and that there is an existing problem with drainage in the area. In addition that development would lead to further congestion along Monks Moss.

76. The council explains that external organisations such as the Scottish Environment Protection Agency and Scottish Water as well as their internal transport service have been consulted as part of the preparation of the proposed plan. Where potential deficiencies in infrastructure have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of local plan allocations while in others, there will be “on demand” provision or upgrades to existing provision. Policy 3 (Infrastructure and services) and Policy 4 (Planning obligations) seek to ensure that the required levels of infrastructure are delivered. I also note that a flood risk assessment will be required as part of any development proposal. I am not aware of any objection from the council’s transport section to the development of the site and I did not see evidence of undue congestion along Monks Moss on my site inspection.

77. With regard to the impact on the amenity of neighbouring residents in particular in relation to noise, unfortunately some adverse impacts are inevitable for those living close to a new development. These impacts can be minimised through planning conditions at the planning application stage and Policy 10 (Amenity) provides additional safeguards to prevent a significant detrimental impact on amenity. Given these safeguards, the suggested impacts on amenity would not justify the deletion of this site from the proposed plan. In accordance with standard planning procedure, loss of views is not a matter which I am able to take into account in assessing the land-use implications of the proposal.

78. The housing requirements for this area of Fife are set out in the TAYplan Strategic
Development Plan. In order to satisfy these housing requirements, it has been necessary for the council to allocate both greenfield and brownfield sites in those settlements with adequate facilities to accommodate additional development. I accept that Ladybank has facilities commensurate with the level of housing proposed.

79. Finally, the council has informed me that a planning application for this site for the erection of 23 affordable residential units (4 flats and 19 dwellings) with associated infrastructure, landscaping and the formation of an access was approved on 17 November 2015 (16/00848/FULL). This accords with the representation from the owners of the site that it is suitable for a larger number of affordable dwellings than currently proposed. Taking all of this into account, I am satisfied that the allocation of this site for housing is justified and should remain. Given the recent planning approval I also consider that the plan should be amended to refer to the planning approval and to show an estimated capacity of 23, instead of the current 6 dwellings.

80. The safety and disturbance concerns with regard to children playing at the nearby garages is a matter for the council to respond to and outside my remit to comment on.

STRATHMIGLO

Candidate site - East and West Back Dykes

81. I acknowledge that there is a shortfall in meeting the housing land requirement in the SESplan area of Fife together with the uncertainties expressed with regard to the level of that shortfall under Issue 2b Homes. However, the conclusions find that adequate housing land has been provided in the TAYplan area in line with the requirements set out in the strategic development plan. In addition the 2015 Housing Land Audit has found that there is a 5-year effective housing land supply in both the Cupar and North West Fife and St Andrews and North East Fife Housing Market Areas. Accordingly there is no strategic numerical justification to allocate further sites for housing within the TAYplan area.

82. This 4 hectare site is located to the north of Strathmiglo, outside the settlement envelope in the St Andrews and East Fife Local Plan. The greenfield agricultural land is split into 2 fields on either side of Stocks Wynd. It is bounded by woodland and then the A91 to the north; East and West Dykes and then existing housing to the south; Station Road to the west and the A912 to the east. A residential development of up to 100 houses is proposed.

83. I am aware of the availability of local facilities and services within Strathmiglo and the lack of any housing allocations in the village for the plan period. However, a development of the scale proposed would represent a major expansion for a settlement of this size and I share the concerns of the council that the addition of 100 houses could alter the character of the village. I have taken into account the supporting information contained within the submitted planning and delivery statement and the access appraisal including the proposed affordable housing and open space provision, the possible benefits towards maintaining a vibrant community and the opportunity to deliver green network opportunities/improve access to the surrounding countryside and community woodland.

84. I have also noted the council’s response to a formal pre-application enquiry which was submitted following my further information request FIR 42.
85. I conclude that given the lack of any wider need for the allocation of additional housing sites in the TAYplan area there is insufficient justification for a development of this scale, at this location. The arguments advanced with regard to the need for a range of scale of sites, the site’s sustainable location, visual containment and effectiveness do not alter my view.

86. The Cupar North Strategic Development Area is dealt with in Issue 17.

Bellfield

87. This site is designated as a Local Landscape Area in the St Andrews and East Fife Local Plan and is located in the open countryside. Both the council and the representor have drawn my attention to an extant planning permission in principle for 5 houses (14/01095/PPP). On my site inspection, I noted that clearance work had commenced on-site. The owner of the site has confirmed (following my further information request FIR 103) that he demolished the existing poultry sheds earlier in 2016 and that he is currently actively marketing the site.

88. The principle of housing development on the site has been established and agreed by the council. I find the council’s refusal to show the site as a housing allocation in the proposed plan to be inconsistent with their previous decision to approve planning permission in principle for housing on the site. Excluding the site from the proposed plan will not prevent “potential inappropriate development in the countryside” as the site already has an extant consent. I conclude that this site should be identified for 5 houses in the proposed plan to reflect the extant consent. Given the sensitive and isolated rural location of the site, I agree that the green network priorities identified by the council in their response to the further information request should be added to the proposed plan and I have included a development requirement to restrict development on the site to 5 dwellings.

89. The Cupar North Strategic Development Area is dealt with in Issue 17.

COUNTRYSIDE AREAS

LWD004 – Pitlair 2, Bow of Fife

90. This site is allocated for housing in the St Andrews and East Fife Local Plan and now has planning approval for the erection of 8 warden assisted dwellings (13/03407/FULL dated 13 January 2014). While noting the serious concerns expressed by the Scottish Environment Protection Agency with regard to flood risk on the site, I agree with the council that the site should remain identified in the proposed plan to reflect the extant planning consent. The removal of the site from the proposed plan would not prevent the current consent being implemented.

91. The development requirements for the site recognise that the Scottish Environment Protection Agency has identified the site as at risk from flooding and state that, in the case of the planning consent lapsing, any application to renew consent or for a new planning application would not be supported by the council. I am satisfied that this will ensure that any future development proposals would not be approved, without the need to remove the site from the proposed plan.

92. I conclude that the site should remain as a housing allocation.
93. This site is for the extension of the landfill and recycling centre at Lower Melville Wood and was allocated as a leisure and community facility in the St Andrews and East Fife Local Plan. Following my further information request FIR 43 the council has reiterated its on-going responsibility to provide for the collection, treatment and disposal of municipal waste. At present some of this waste is landfilled at 2 sites operated by the council, one of which is Lower Melville Wood. Further development at Lower Melville Wood is considered to be critical for the council to fulfil its responsibilities, in the longer term. I have insufficient information to reasonably conclude that this is not the case and am not aware of any changes since the adoption of the last local plan which would justify the removal of this proposal for expansion.

94. However, following my site inspection, I can understand the concerns expressed in representations about inadequate screening and the possible impact on the amenity of local residents, particularly as a result of any expansion to the north-east of the site. I welcome the council’s commitment that further development in the general area of the site will be restricted, in the main, to land immediately to the west of the existing site, a redundant sand and gravel quarry. This commitment should be included as a development requirement within the plan.

95. I note that the existing development requirements for the site refer to detailed consideration of the layout, height and landform, together with assessment of the environmental health factors affecting site development, being subject to local consultation as part of any planning application. Given the potential for adverse impacts on the amenity of local residents, I also consider that specific reference to amenity issues should be added to the factors which will be the subject of this local consultation.

96. Finally I agree that given the multiple views of the site from the A92 and A91, ample screening should be included as an important aspect of any planning application for the site.

97. I am satisfied that with the inclusion of these additional development requirements, it would be appropriate to retain the existing site boundary in the plan.

**Reporter’s recommendations:**

I recommend that the following modifications be made:

1. On page 85 of the proposed plan, for site FAL001, St John’s Works, delete the first sentence of the development requirements and replace with the following:

   “A Development Framework will be required. The preparation of the Development Framework will involve public consultation and engagement with the local community.”

2. On page 124 of the proposed plan, amend the estimated capacity(housing) for site LAD 004 The Road End, Loftybank, to read “23” instead of “6” and add the following to the status, additional development requirements and other information:

   “This site has planning permission 16/00848/FULL granted on 17 November 2015.”
3. Add the site identified in further information request FIR 103 (planning approval 14/01095/PPP) as a housing site to the “Countryside Area” section of the settlement plans as follows. Show the site on the proposals map including the additional green network opportunities (dashed pink lines) shown on the “Poultry sheds Strathmiglo GN apps” attachment.

“Ref: LWD…
Location: Bellfield
Area: 1.3
Description: Housing
Capacity (Housing): 5 maximum
Lead Agency: Private sector

Status, additional development requirements and other information – This site has planning permission in principle (14/01095/PPP). Given the sensitive rural location of this site, no more than 5 dwellings would be allowed. Proposals in excess of this number will be treated as contrary to Fifeplan.

Green network priorities:

- Create high quality landscaped edges on all boundaries of the development to create an appropriate landscape setting for the development. To incorporate habitat provision, sustainable urban drainage and recreational greenspace functions.
- Investigate the provision of a shared use path connecting the site west to the core path into Strathmiglo.”

4. On page 187 of the proposed plan, for site LWD 027, Lower Melville Woods, Ladybank, replace the third development requirement with the following:

“Detailed consideration of the layout, height and landform, together with assessment of the environmental health factors affecting site development and the impact on the amenity of local residents, will be subject to local consultation as part of any planning application.”

And add the following 2 new development requirements:

“Further development in the general area of the site will be restricted, in the main, to land immediately to the west of the existing site, a redundant sand and gravel quarry.”

“Proposals for ample screening from the A92 and A91 should be included as part of any planning application.”
<table>
<thead>
<tr>
<th>Issue 19</th>
<th>Newburgh Area</th>
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<tbody>
<tr>
<td><strong>Development plan reference:</strong></td>
<td>Settlement Plans – Newburgh (pages 145 – 146) and Countryside Area (Proposal LWD 003, page 182).</td>
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**Body or person(s) submitting a representation raising the issue (including reference number):**

**NEWBURGH**

Newburgh issues

King Group (508)
Julie Watson (1624)
Ristol Consulting Ltd for (1970)

NEB001

Alan Magnus-Bennett (84)
Newburgh Sustainable Housing Campaign (86)
Julie Goring (115)
Hugh Goring (116)
Robert Stewart (135)
Jessie McFarlane (169)
P Williamson (175)
Andrew Mckenzie Smith (180)
Carol Mathieson (204)
Annabel Duff (206)
Sharon Ross (208)
Wendy Marshall (226)
Tom Ross (227)
Mary Hamilton (228)
Annie Gordon (229)
Laura Stewart (240)
Isobel Johnston (243)
Gordon Gillespie (263)
A B Doig (277)
Anne Corcoran (278)
Ingrid Haas (282)
Kathleen Low (292)
William Duff (296)
Eileen Todd (300)
Ingrid Todd (303)
Joyce Birnie (304)
Tracey Stewart (312)
Carole Melville (374)
GP Newburgh Surgery (514)
Maude Mathieson (517)
David Mathieson (519)
Sharon Ross (642)

NEB001 (cont)

A A and J Brand (2083)
Francis Riley (2606)
Angela Gilchrist (2697)
Sam Saunders (3086)
Jean Dickson (3126)
L McIntyre (3397)
R J Batchelor (3627)
P McIntosh (3826)

NEB002

Carol Mathieson (205)
Annabel Duff (207)
Anne Corcoran (279)
Eileen Todd (301)
Joyce Birnie (305)
Tracey Stewart (322)
Carole Melville (375)
Maude Mathieson (518)
David Mathieson (520)
Alison Anderson (669)
A McIntyre (674)
T Pearson (888)
James Douglas (934)
Martin Smith (1159)
Edward Oakden (1258)
Mr and Mrs Allan (1269)
Wills Oakden (1286)
Julie Watson (1622)
Muir Homes Ltd (1837)
C Bain (1864)
A & J Stephen Ltd (2149)
Francis Riley (2607)
Sam Saunders (3087)
Jean Dickson (3130)
R J Batchelor (3628)
P McIntosh (3827)
Mary Hamilton (3871)
Annie Gordon (3872)
Elizabeth Oliphant (3881)
PROPOSED FIFE LOCAL DEVELOPMENT PLAN

Provision of the development plan to which the issue relates:

Settlement Plans – Newburgh and Countryside Area (LWD003).

Planning authority’s summary of the representation(s):

NEWBURGH

Newburgh Issues

Julie Watson (1624) object to the settlement plan for Newburgh as there is no evidence of demand for this number of houses. Newburgh sustainable housing group campaign clearly showed the majority of residents wanting a maximum of 100 new houses built over 10 years. Empty properties and brownfield sites should be developed before distributing agricultural land.

NEB001- South of Cupar Road

Julie Goring (115); Annabel Duff (206); Anne Corcoran (278); Ingrid Todd (303); Carole Melville (374); David Mathieson (519); James Douglas (933); Dr Edward Oakden (1257); Wills Oakden (1285); P McIntosh (3826); Jean Dickson (3126); L McIntyre (3397); P Williamson (175); Wendy Marshall (226); Annie Gordon (229); Ingrid Haas (282); Helen Doris (659); Elizabeth Oliphant (1384); Hugh Goring (116); Gordon Gillespie (263); Kathleen & Pete Low (292); Joyce Birnie (304); Newburgh Medical Practice (514); Alison Anderson (668); T Pearson (887); Mr & Mrs Allan (1268); Julie Watson (1623); Francis Riley (2606); R J Batchelor (3627); Robert Stewart (135); Angela Gilchrist (2697); Tom Ross (227); Laura Stewart (240); William Duff (296); James Laughlan (1261); Anne Miller (1687); Carol Mathieson (204); A B Doig (277); Eileen Todd (300); Tracey Stewart (312); Maude Mathieson (517); A McIntyre (673); Martin Smith (1158); Sarah Murray (1282); C. Bain (1863); Sam Saunders (3086); Alan Magnus Bennett (84); Jessie McFarlane (169); Sharon Ross (208); Mary Hamilton (228); Isobel Johnston (243); SEPA (3580)

NEB003

SEPA (3560)

NEB004

Convener Newburgh Train Station Group (1395)

SEPA (3560)

COUNTRYSIDE AREA

LWD003

SEPA (3560)
Sharon Ross (642); Judith Laughlan (1331), Stuart Bruce (1515) object to the allocation of the above site on one or more of the following grounds:

**Principle of Development**

- Housing need not justified.
- Why build on large Greenfield sites when there are brownfield sites and empty properties available.
- There are enough unoccupied homes and brownfield sites in Newburgh to allow for small scale development which could be integrated into the existing built up areas rather than on the periphery of the town altering both the sensitive local landscape and the successful integration of long-standing community members.

**Scale and Location**

- No objection to additional housing but would like this to be on a reasonable scale in keeping with the current scale of Newburgh.
- Generic normal growth is good for any town, and helps to stimulate jobs, businesses and wellbeing of inhabitants; in a town such as Newburgh it should not be subjected to a sudden growth rate of over 50% in residential dwelling units.
- Large-scale development is neither wanted nor needed - agreement that some housing, especially social housing, is required, but not to the extent of building 275 new houses.
- The Newburgh sustainable housing campaign carried out a survey showing the majority of residents in Newburgh wanting a maximum of 100 houses built over 10 years – this was previously accepted by Fife Council.
- Allow for a small low impact sustained growth for a Town and Community at large - a few houses, 100 maximum - built with a variety of styles and building materials.
- The capacity should not be increased without addressing the fundamental issues.

**Landscape, Townscape, Views and Character**

- Development breaches Fife Council’s policy not to amalgamate small villages and destroy the village atmosphere - site currently offers an attractive gateway and separates the town from the hamlet of Burnside.
- Craigmill is a residential community with its own identity, encroachment of the proposed building area NEB001 does not contain a sufficient green belt buffer zone that enables the retention of that identity.
- The development will destroy the character of the town; need development that will allow the town to retain its strong sense of identity and community.
- The large scale development would also have an impact on the sensitive local landscape – previous planning application turned down for a wind turbine as it would have had an adverse impact on the sensitive local landscape and could impact detrimentally on tourism, in an area of great landscape value.
- Greenfield site will be lost forever.
- Development as proposed would not be sustainable & be detrimental to the built environment.

**Transport**

- Development would create ribbon development and result in a large increase in
volume of traffic.

- There is a lack of employment in Newburgh so development will be full of commuters which will lead to an increase in traffic as transport links are poor.
- Newburgh High Street is already congested; the addition of 275 new homes will have further impact.
- There is still no commitment from Network Rail to build a rail halt for Newburgh, this also being a 'fundamentally flawed development strategy'.

Infrastructure and Services

- The infrastructure of Newburgh is already overloaded and cannot sustain further development; existing problem with traffic flow through the High Street which will be compounded with additional housing and local services such as school and health services are already overstretched.
- The existing medical practice premises are already at capacity and are on a very constrained site with no room for expansion and have limited parking. This should be addressed that this is addressed in the Development Plan.

Environment

- There is only a limited number of local businesses therefore it is likely that the vast majority of occupants of these houses will be commuters which on many grounds including environmental, is not a sound policy and will lead to increased congestion and pollution.

Miscellaneous

- Bought a house in the countryside not to be surrounded by houses on the Cupar Road.
- Lack of consultation by Stephen Homes.

Newburgh Sustainable Housing Campaign (86) - Similar proposal was put forward by Fife Council in their Structure Plan in 2005; at this time a local group was formed called Newburgh Sustainable Housing Campaign which held public meetings and carried out a survey of the community asking how many new houses should be built over 10 years. The result of this survey clearly showed the people of Newburgh and Burnside wanted a maximum of 100 new houses built over 10 years. This result was sent to Fife Council who saw the merit in the survey and in the revised Structure Plan of 2006 reduced the number of new houses to 20. The number of new houses proposed in the latest Local Development Plan needs to be significantly reduced again.

AA and J Brand (2083) wish to formally object to the allocation of the site. Identification of the part of this site for residential development of approximately 225 units in the Proposed Plan is regarded as premature at this time and they wish to object to the proposed allocation for the reasons stated below:

- Concerns are in relation to the marketability of the location and the deliverability of the site as there is a lack of a named lead developer at this time; multi-ownership may be a constraint to deliverability. Whether the site can be regarded as an effective housing site has not been demonstrated by Fife Council in the supporting evidence.
PROPOSED FIFE LOCAL DEVELOPMENT PLAN

- Question the marketability of the location as Newburgh is not situated in an accessible location. Consequently, they are not satisfied that the allocation is the right development in the right location and it is therefore contrary to SPP objectives (page 13).
- Creates uncertainty which may prove damaging in attracting private sector investment/interest and calls into question the site’s development potential as a viable and deliverable housing site failing to meet the Tests of effectiveness in PAN 2/2010 – Affordable Housing and Housing Land Audits due to the existence of these constraints.
- Allocation would be contrary to the Policy Principles of SPP (June 2014) as the site is unlikely to deliver that proportion of the required housing to meet the identified shortfall within the period of the plan, as expected by SPP and Fife Council will be unable to provide a generous supply of housing land for the Housing Market Area (HMA).

Andrew McKenzie (180) is Trustee of a family Trust that owns part of the land in question. In principle support the development as proposed for Newburgh and would hope that any expected development would be seen as 'sustainable' in that the building of new homes would take place over many years. Strongly disagree with some previous comments is the repeated suggestion that this is not what the community wants; there is a Facebook page called "Newburgh Now, Newburgh Then" The site has over 1300 'members' and would suggest that well over 75% of the comments are 'for' rather than against the future development of our town and it is very misguided for a (very) small vocal minority to claim that they have the 'support' of, and talk for, the residents of Newburgh.

NEB002 – Land North of Cupar Road

Carol Mathieson (205); Eileen Todd (301); Carole Melville (375); Alison Anderson (669); T Pearson (888); Martin Smith (1159); Wills Oakden (1286); C.Bain (1864); Sam Saunders (3087); Mary Hamilton (3871); P McIntosh (3827); Annabel Duff (207); Joyce Birnie (305); Maude Mathieson (518); A McIntyre (674); Dr Edward Oakden (1258); Julie Watson (1622); Jean Dickson (3130); Anne Corcoran (279); Tracey Stewart (322); David Mathieson (520); James Douglas (934); Mr & Mrs Allan (1269); Francis Riley (2607); R J Batchelor (3628); Annie Gordon (3872); Elizabeth Oliphant (3881) object to the allocation of the site on one or more of the following grounds:

Principle of Development

- Housing need not justified.
- Why build on large Greenfield sites when there are brownfield sites and empty properties available.
- There are enough unoccupied homes and brownfield sites in Newburgh to allow for small scale development which could be integrated into the existing built up areas rather than on the periphery of the town altering both the sensitive local landscape and the successful integration of long-standing community members.
- No evidence of demand for this number of houses.
- Development would create ribbon development and result in a large increase in volume of traffic.
PROPOSED FIFE LOCAL DEVELOPMENT PLAN

Scale and Location

- Large-scale development is neither wanted nor needed - agreement that some housing, especially social housing, is required, but not to the extent of building 275 new houses.
- The Newburgh sustainable housing campaign carried out a survey showing the majority of residents in Newburgh wanting a maximum of 100 houses built over 10 years – this was previously accepted by Fife Council.
- The capacity should not be increased without addressing the fundamental issues.
- Urge Fife Council to drastically reduce the number of new houses for Newburgh.

Landscape, Townscape, Views and Character

- Development breaches Fife Council’s policy not to amalgamate small villages and destroy the village atmosphere - site currently offers an attractive gateway and separates the town from the hamlet of Burnside.
- Craigmill is a residential community with its own identity, encroachment of the proposed building area NEB001 does not contain a sufficient green belt buffer zone that enables the retention of that identity.
- The development will destroy the character of the town; need development that will allow the town to retain its strong sense of identity and community.
- The large scale development would also have an impact on the sensitive local landscape – previous planning application turned down for a wind turbine as it would have had an adverse impact on the sensitive local landscape and could impact detrimentally on tourism, in an area of great landscape value.
- Greenfield site will be lost forever; inappropriate use of agricultural land.
- Development as proposed would not be sustainable & be detrimental to the built environment.
- The village feel will be spoiled; building new homes on the edge of town is always an eyesore.

Transport

- There is a lack of employment in Newburgh so development will be full of commuters which will lead to an increase in traffic as transport links are poor.
- Newburgh High Street is already congested; the addition of 275 new homes will have further impact.
- No jobs in Newburgh which means more commuting which leads to more climate change.

Infrastructure and Services

- The infrastructure of Newburgh is already overloaded and cannot sustain further development; existing problem with traffic flow through the High Street which will be compounded with additional housing and local services such as school and health services are already overstretched.
- Existing sewage plant does not cope.
- Newburgh does not have the infrastructure to cope with a huge influx of people; already pressure on existing facilities which are at capacity.
**Environment**

- There is only a limited number of local businesses therefore it is likely that the vast majority of occupants of these houses will be commuters which on many grounds including environmental, is not a sound policy and will lead to increased congestion and pollution.

**Economy**

- There are no opportunities for people in Newburgh

**Miscellaneous**

- Bought a house in the countryside not to be surrounded by houses on the Cupar Road.
- Lack of consultation by Stephen Homes.

Muir Homes (1837) seeks the proposed additional residential allocation in Newburgh (NEB002) to be deleted from the Local Development Plan on the grounds that:

- This additional 50 unit allocation for Newburgh is considered inappropriate in strategy and site specific terms.
- Newburgh already has significant undeveloped allocations in excess of 225 units (NEB001).
- There is no assessment of the need/justification for an additional allocation beyond this level presently.
- Additional allocation to a non-performing area is unlikely to assist deliverability and the provision/maintenance of an effective housing land supply.
- There are clear environmental (landscape, flooding and prime agricultural land), settlement (scale of existing allocations) and infrastructure (Primary School capacity) constraints impacting on this site that clearly count against its allocation.
- This negative position is further reinforced when considering the availability of other more suitable sites without such constraints within the Cupar/Howe of Fife area, such as the site at Leckybank and Lochiebank Farms, Auchtermuchy.

A & J Stephen (2149) – Statement submitted in support of land to the north of Cupar Road, Newburgh promoting the land as the preferred direction for growth in the emerging Local Development Plan. The statement endorses the site in the Proposed Plan and also promotes additional land (candidate site LDP-NEB002a). The submission is designed to provide sufficient information to form the basis of further engagement with Officers, the local community and the Reporter(s) at the LDP Examination.

It is considered that the identification of housing and ancillary development, the scale of which to be determined through a Development Framework and Community Master planning process will facilitate a more co-ordinated approach for housing, employment and cemetery extension uses to the north of Cupar Road.

**NEB003 – Mugdrum East**

SEPA (3580) supports the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken.
NEB004 – Newburgh Rail Halt

Newburgh Train Station Group (1395) confirms there is considerable support for a reopened rail halt in Newburgh and demand for a new station has already been proven. The supporting material provided by the Group is considered by the Group to show clear advantages, benefits and support for the Newburgh station halt and robustly indicates its feasibility. New housing planned for Newburgh would only serve to increase this already identified present demand but that should not be the premise on which to base the proposal’s viability. Newburgh, in terms of transport provision, especially public transport, is particularly geographically isolated.

Newburgh Train Station Group welcomes the Green Network Priorities included in the plan since a high quality development and landscape edge envisaged are needed. The group on behalf of the community in Newburgh would also like to strongly register the need to retain the long standing business components of the site and even allowance for new businesses which have historically always sprung from the presence of railway lines and stations.

Stuart Bruce (1513): The suggested proposal to build a Rail halt should be encouraged. Installing such a Rail halt would increase use of the railways and reduce the total number of cars on the roads - having a beneficial impact on Pollution, the environment as well as safety of our roads.

Julie Watson (1896): Newburgh needs additional transport links via the rail network.

Transport Scotland (3223): Agreement has not been reached with Transport Scotland on the inclusion of proposal NEB 004 within the Plan as the results of an appropriate appraisal have not successfully concluded that a rail station is a viable option which can be implemented and delivered. Therefore it is recommended proposal NEB 004 should be removed from the Plan.

Sites (not in the Proposed FIFEplan) proposed by Objectors

Candidate Site LDP-NEB001 – Banklands, Woodriffe Road

King Group (508) - request that the Proposed LDP is amended to include 1.8 hectare site at Woodriffe Road, Banklands, Newburgh as a housing proposal with capacity for 30 houses. The site was identified as Candidate Site LDP-NEB001 in the Development Strategy Consultation and the objector has submitted a detailed Statement setting out the background and policy context for this matter.

Lindores Abbey Farm steading

RCL (1970) object to the Newburgh settlement boundary and request its adjustment to include land at Lindores Abbey Farm steadings as shown in Supporting Documents. Lindores Abbey Farm benefits from planning permission (09/01976/PPP) for 7 residential units (see Supporting Document SD1, SD2 and SD3) subject to conclusion of a section 75 agreement. The principle of development has therefore been established and therefore it would seem logical to incorporate the site into the settlement boundary. The site is subject of early planning work for inclusion into a wider distillery linked to Lindores Abbey and its inclusion within the settlement boundary would ensure the principle of development already established would find a development plan context.
### COUNTRYSIDE AREA

**LWD003 – Glenduckie Farm, Lindores**

SEPA (3560) supports the inclusion within the Development Requirements for a Flood Risk Assessment to be undertaken; the inclusion of a Site Requirement for a buffer strip along the watercourse as this measure will help protect and improve the water environment and the inclusion of the requirement to consider through a feasibility study, the potential for restoration and improvement of the water environment through the site design.

### Modifications sought by those submitting representations:

#### NEWBURGH

**Newburgh Issues**

Julie Watson (1624) Reduce the number of new houses allocated for Newburgh in FIFEplan to 100 over 10 years.

**NEB001- South of Cupar Road**

Julie Goring (115); Annabel Duff (206); Anne Corcoran (278); Ingrid Todd (303); Carole Melville (374); David Mathieson (519); James Douglas (933); Dr Edward Oakden (1257); Wills Oakden (1285); P McIntosh (3826); Jean Dickson (3126); L McIntyre (3397); P Williamson (175); Wendy Marshall (226); Annie Gordon (229); Ingrid Haas (282); Helen Doris (659); Elizabeth Oliphant (1384); Hugh Goring (116); Gordon Gillespie (263); Kathleen & Pete Low (292); Joyce Birnie (304); Newburgh Medical Practice (514); Alison Anderson (668); T Pearson (887); Mr & Mrs Allan (1268); Julie Watson (1623); Francis Riley (2606); R J Batchelor (3627); Robert Stewart (135); Angela Gilchrist (2697); Tom Ross (227); Laura Stewart (240); William Duff (296); James Laughlan (1261); Anne Miller (1687); Carol Mathieson (204); A B Doig (277); Eileen Todd (300); Tracey Stewart (312); Maude Mathieson (517); A McIntyre (673); Martin Smith (1158); Sarah Murray (1282); C. Bain (1863); Sam Saunders (3086); Alan M Bennett (84); Jessie McFarlane (168); Sharon Ross (208); Mary Hamilton (228); Isobel Johnston (243); Sharon Ross (642); Judith Laughlan (1331); Stuart Bruce (1515) seek removal of the site with brownfield sites being allocated as an alternative, however if allocation is to be agreed then site capacity should be substantially decreased.

Newburgh Sustainable Housing Campaign (86) requires the number of new houses proposed in the Local Development Plan to be significantly reduced.

AA and J Brand (2083):

- Removal of Site NEB 001 from the Settlement Plan for Newburgh;
- Removal of the associated zoning on the Proposals Map for Newburgh Settlement; and
- A redistribution of the 225 units proposed to be allocated for this site to other more suitable sites in the same HMA.

Andrew McKenzie (180): none stated.
NEB002 – Land North of Cupar Road

Carol Mathieson (205); Eileen Todd (301); Carole Melville (375); Alison Anderson (669); T Pearson (888); Martin Smith (1159); Wills Oakden (1286); C Bain (1864); Sam Saunders (3087); Mary Hamilton (3871); P McIntosh (3827); Annabel Duff (207); Joyce Birnie (305); Maude Mathieson (518); A McIntyre (674); Edward Oakden (1258); Julie Watson (1622); Jean Dickson (3130); Anne Corcoran (279); Tracey Stewart (322); David Mathieson (520); James Douglas (934); Mr & Mrs Allan (1269); Francis Riley (2607); R J Batchelor (3628); Annie Gordon (3872); Elizabeth Oliphant (3881): Delete proposal NEB002 from FIFEplan, with brownfield sites being allocated as an alternative.

Muir Homes (1837): Delete proposal NEB002 from FIFEplan, allocate site in Auchtermuchty as an alternative.


NEB003 – Mugdrum East

SEPA (3580): none stated.

NEB004 – Newburgh Rail Halt

Newburgh Train Station Group (1395), Stuart Bruce (1513), Julie Watson (1896): none stated.

Transport Scotland (3223): Remove proposal NEB004 from FIFEplan.

Sites (not in the Proposed FIFEplan) proposed by Objectors

Candidate Site LDP-NEB001- Banklands, Woodriffe Road

King Group (508): Allocate Candidate Site LDP-NEB001 in the FIFEplan as a housing proposal with capacity for 30 houses.

Lindores Abbey Farm steading

RCL (1970): Request the adjustment of the Newburgh settlement boundary to include land at Lindores Abbey Farm steading.

COUNTRYSIDE AREA

LWD003 – Glenduckie Farm, Lindores

SEPA (3560) none stated.
Summary of responses (including reasons) by planning authority:

NEWBURGH

Newburgh Issues, NEB001- South of Cupar Road and NEB002 – Land North of Cupar Road

Principle of Development

Julie Goring (115); Annabel Duff (206, 207); Anne Corcoran (278, 279); Ingrid Todd (303); Carole Melville (374, 375); David Mathieson (519, 520); James Douglas (933, 934); Dr Edward Oakden (1257, 1258); Wills Oakden (1285, 1286); P McIntosh (3826, 3827); Jean Dickson (3126, 3130); L McIntyre (3397); P Williamson (175); Wendy Marshall (226); Annie Gordon (229, 3872); Ingrid Haas (282); Helen Doris (659); Elizabeth Oliphant (1384, 3881); Hugh Goring (116); Gordon Gillespie (263); Kathleen & Pete Low (292); Joyce Binnie (304, 305); Newburgh Medical Practice (514); Alison Anderson (668, 669); T Pearson (887, 888); Mr & Mrs Allan (1268, 1269); Julie Watson (1622, 1623, 1624); Francis Riley (2606, 2607); R J Batchelor (3627, 3628); Robert Stewart (135); Angela Gilchrist (2697); Tom Ross (227); Laura Stewart (240); Wendy Marshall (296); James Laughlan (1261); Anne Miller (1687); Carol Mathieson (204, 205); A B Doig (277); Eileen Todd (300, 301); Tracey Stewart (312, 322); Maude Mathieson (517, 518); A McIntyre (673, 674); Martin Smith (1158, 1159); Sarah Murray (1282); C Bain (1863, 1864); Sam Saunders (3086, 3087); Alan Magnus Bennett (84); Jessie McFarlane (169); Sharon Ross (208); Mary Hamilton (228, 3871); Isobel Johnston (243); Sharon Ross (642); Judith Laughlan (1331); Stuart Bruce (1515); Muir Homes (1837): Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with in Issue 2B Homes.

Fife Council considers the re-use of previously developed land before development on greenfield sites, in line with Scottish Planning Policy 2014 (CD1). In order to conform to TAYplan Strategic Development Plan requirements, however, it has been necessary to include greenfield development sites in the Local Development Plan. Further, the provision of a mix of brownfield and greenfield sites is required to provide sufficient choice for the market to deliver the developments an area needs. In forming the settlement strategy for FIFEplan, whilst it is inevitable that some prime agricultural land will be used in allocating the land required to meet the TAYplan housing requirement, Fife Council has considered (through the site assessment process) the impact of the various options on prime quality agricultural land and has sought to minimise its loss.

Scale and Location

Julie Goring (115); Annabel Duff (206, 207); Anne Corcoran (278, 279); Ingrid Todd (303); Carole Melville (374, 375); David Mathieson (519, 520); James Douglas (933, 934); Dr Edward Oakden (1257, 1258); Wills Oakden (1285, 1286); P McIntosh (3826, 3827); Jean Dickson (3126, 3130); L McIntyre (3397); P Williamson (175); Wendy Marshall (226); Annie Gordon (229, 3872); Ingrid Haas (282); Helen Doris (659); Elizabeth Oliphant (1384, 3881); Hugh Goring (116); Gordon Gillespie (263); Kathleen & Pete Low (292); Joyce Binnie (304, 305); Newburgh Medical Practice (514); Alison Anderson (668, 669); T Pearson (887, 888); Mr & Mrs Allan (1268, 1269); Julie Watson (1622, 1623, 1624); Francis Riley (2606, 2607); R J Batchelor (3627, 3628); Robert Stewart (135); Angela Gilchrist (2697); Tom Ross (227); Laura Stewart (240); William
A Development Framework covering Sites NEB001 and NEB002 is to be prepared by the developer for Fife Council approval with input from all landowners. This will identify the limits and phasing of development. The Development Framework will be a vehicle to deliver the mix of uses required for the infrastructure to secure implementation. The land areas for these uses are indicative only. It is anticipated that subsequent planning approvals may be subject to appropriate planning obligations to secure full implementation. Key elements of the Development Framework should include employment land for Classes 4 (business), 5 (general industrial) and 6 (storage & distribution), and community facilities in the shape of land for expansion of the local primary school and land for an extension to the cemetery.

The site was historically allocated with a capacity for 500 units (380 in plan period and 120 post plan) within the Draft St. Andrews and East Fife Local Plan (2005); this figure was modified within the Finalised (2009) and adopted (2012) St. Andrews and East Fife Local Plan (CD9) to 225 units (150 in plan period and 75 post plan).

Landscape, Townscape, Views and Character

The Development Framework will require that a separation be maintained between housing at the eastern edge of Newburgh and the houses in Burnside to avoid settlement coalescence.
Site assessments were conducted on all potential development sites before their inclusion in the Proposed Plan (CD15). These assessments were undertaken in accordance with Section 5(3) (a) of the Environmental Assessment (Scotland) Act 2005. The SEA Environmental Report assesses the potential significant environmental impact of implementing the policies and proposals contained within the Plan across a number of themes - this includes landscape. The Plan has therefore been assessed for the extent to which its policies protect valued landscape areas and more local features of value and how its proposals may change areas of relatively high landscape value.

Transport, Infrastructure and Services

Julie Goring (115); Annabel Duff (206, 207); Anne Corcoran (278, 279); Ingrid Todd (303); Carole Melville (374, 375); David Mathieson (519, 520); James Douglas (933, 934); Dr Edward Oakden (1257, 1258); Wills Oakden (1285, 1286); P McIntosh (3826, 3827); Jean Dickson (3126, 3130); L McIntyre (3397); P Williamson (175); Wendy Marshall (226); Annie Gordon (229, 3872); Ingrid Haas (282); Helen Doris (659); Elizabeth Oliphant (1384, 3881); Hugh Goring (116); Gordon Gillespie (263); Kathleen & Pete Low (292); Joyce Birnie (304, 305); Newburgh Medical Practice (514); Alison Anderson (668, 669); T Pearson (887, 888); Mr & Mrs Allan (1268, 1269); Julie Watson (1622, 1623, 1624); Francis Riley (2606, 2607); R J Batchelor (3627, 3628); Robert Stewart (135); Angela Gilchrist (2697); Tom Ross (227); Laura Stewart (240); William Duff (296); James Laughlan (1261); Anne Miller (1687); Carol Mathieson (204, 205); A B Doig (277); Eileen Todd (300, 301); Tracey Stewart (312, 322); Maude Mathieson (517, 518); A McIntyre (673, 674); Martin Smith (1158, 1159); Sarah Murray (1282); C Bain (1863, 1864); Sam Saunders (3086, 3087); Alan M Bennett (84); Jessie McFarlane (169); Sharon Ross (208); Mary Hamilton (228, 3871); Isobel Johnston (243); Sharon Ross (642); Judith Laughlan (1331); Stuart Bruce (1515).

Council Services such as Transportation, Housing Services and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the Development Planning process. Where potential deficiencies in infrastructure have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision. Detailed matters, such as the specifications of road access and site layout for example, are dealt with at planning application stage.

All transport impacts from the development site will be identified and appraised through the completion by the developers (for Fife Council approval) of a detailed Transport Assessment. The Transport Assessment will inform and support the submission of planning applications to Fife Council by development interests.

Environment

Julie Goring (115); Annabel Duff (206, 207); Anne Corcoran (278, 279); Ingrid Todd (303); Carole Melville (374, 375); David Mathieson (519, 520); James Douglas (933, 934); Edward Oakden (1257, 1258); Wills Oakden (1285, 1286); P McIntosh (3826, 3827); Jean Dickson (3126, 3130); L McIntyre (3397); P Williamson (175); Wendy Marshall (226); Annie Gordon (229, 3872); Ingrid Haas (282); Helen Doris (659); Elizabeth Oliphant (1384, 3881); Hugh Goring (116); Gordon Gillespie (263); Kathleen & Pete Low (292); Joyce Birnie (304, 305); Newburgh Medical Practice (514); Alison Anderson (668, 669); T Pearson (887, 888); Mr & Mrs Allan (1268, 1269); Julie Watson
(1622, 1623, 1624); Francis Riley (2606, 2607); R J Batchelor (3627, 3628); Robert Stewart (135); Angela Gilchrist (2697); Tom Ross (227); Laura Stewart (240); William Duff (296); James Laughlan (1261); Anne Miller (1687); Carol Mathieson (204, 205); A B Doig (277); Eileen Todd (300, 301); Tracey Stewart (312, 322); Maude Mathieson (517, 518); A McIntyre (673, 674); Martin Smith (1158, 1159); Sarah Murray (1282); C Bain (1863, 1864); Sam Saunders (3086, 3087); Alan M Bennett (84); Jessie McFarlane (169); Sharon Ross (208); Mary Hamilton (228, 3871); Isobel Johnston (243); Sharon Ross (642); Judith Laughlan (1331); Stuart Bruce (1515) - Development will only be supported if it does not have a significant detrimental impact on the amenity of existing or proposed land uses. Issues relating to the amenity of existing residents such as air quality, noise, light and odour pollution etc. would be addressed at the detailed planning application stage. In this event, separate Local Development Plan policies on amenity (Policy 10) will help to protect existing amenity and assist the decision making process on planning applications.

**Miscellaneous**

Julie Goring (115); Annabel Duff (206, 207); Anne Corcoran (278, 279); Ingrid Todd (303); Carole Melville (374, 375); David Mathieson (519, 520); James Douglas (933, 934); Edward Oakden (1257, 1258); Wills Oakden (1285, 1286); P McIntosh (3826, 3827); Jean Dickson (3126, 3130); L McIntyre (3397); P Williamson (175); Wendy Marshall (226); Annie Gordon (229, 3872); Ingrid Haas (282); Helen Doris (659); Elizabeth Oliphant (1384, 3881); Hugh Goring (116); Gordon Gillespie (263); Kathleen & Pete Low (292); Joyce Birnie (304, 305); Newburgh Medical Practice (514); Alison Anderson (668, 669); T Pearson (887, 888); Mr & Mrs Allan (1268, 1269); Julie Watson (1622, 1623, 1624); Francis Riley (2606, 2607); R J Batchelor (3627, 3628); Robert Stewart (135); Angela Gilchrist (2697); Tom Ross (227); Laura Stewart (240); William Duff (296); James Laughlan (1261); Anne Miller (1687); Carol Mathieson (204, 205); A B Doig (277); Eileen Todd (300, 301); Tracey Stewart (312, 322); Maude Mathieson (517, 518); A McIntyre (673, 674); Martin Smith (1158, 1159); Sarah Murray (1282); C Bain (1863, 1864); Sam Saunders (3086, 3087); Alan M Bennett (84); Jessie McFarlane (169); Sharon Ross (208); Mary Hamilton (228, 3871); Isobel Johnston (243); Sharon Ross (642); Judith Laughlan (1331); Stuart Bruce (1515) - Loss of countryside views is not a material planning consideration.

Issues relating to consultation of the proposed plan are dealt with separately under the Statement of Conformity, although at this stage there is not a requirement for Stephen Homes to consult on the proposals; this shall be dealt with at planning application stage.

**Effectiveness of proposed site**

AA and J Brand (2083): In response to comments about effectiveness of sites in the housing supply, the sites allocated in the FIFEplan Local Development Plan will meet the tests of effectiveness as set out in Planning Advice Note 2/2010 Affordable Housing and Housing Land Audits (CD10).

A & J Stephen (2149): Note support for inclusion of site NEB002. However, Fife Council does not support the allocation of additional land to the east of NEB002 (candidate site LDP-NEB002a). This area would be considered to have a significant negative impact on landscape, including loss of views across the open fields between Cupar Road and Lindores Abbey. Allocation of candidate site LDP-NEB002a could lead to coalescence with Burnside.
It should also be noted that the proposed allocation should be developed in conjunction with site NEB001, with a Development Framework covering both sites, which will identify the limits and phasing of development. The Framework should be prepared by the developer for Fife Council approval with input from all landowners.

**NEB003 – Mugdrum East**

SEPA (3580): Support for the FIFEplan position is noted.

**NEB004 – Newburgh Rail Halt**

Newburgh Train Station Group (1395); Stuart Bruce (1513); Julie Watson (1896): Support for the FIFEplan position is noted.

Transport Scotland (3223): The wording within the Local Development Plan reflects comments made by Transport Scotland. The policy confirms that this site is included within the SEStrans Regional Transport Strategy Delivery Plan 2008 – 2023 but that the proposal is not currently supported by the Strategic Transport Projects Review and Transport Scotland who have no commitment towards funding the delivery of a station at this location. Transport Scotland’s policy is to promote better utilisation of the existing network as a first choice and, as such, welcomes proposals for Park-and-Choose sites which complement established rail facilities.

Demand for new station may come about as a result of development at NEB001. In that event the case for a new station will be considered where the needs of the local communities, workers or visitors would be sufficient to generate a high level of demand, and it is more likely that feeder rather than inter-urban services would serve the station. Strategic transport network improvements will include junction and car parking improvements in addition to the safeguarding and provision of serviced employment land.

**Sites (not in the Proposed FIFEplan) proposed by Objectors**

**Candidate Site LDP-NEB001- Banklands, Woodriffe Road**

King Group (508): Newburgh is a settlement with a range of services and is a sustainable location for development. The site has potential for sensitive development to integrate well with existing surroundings and deliver housing for the local market. However, as there are sufficient other effective allocations in Newburgh at this time it remains Fife Council’s position that Candidate Site LDP-NEB001 (Woodriffe Road) should not be allocated for development at this time.

**Lindores Abbey Farm steading**

RCL (1970): Fife Council considers that there is merit in the adjustment of the Newburgh settlement boundary to include land at Lindores Abbey Farm steading and invites the Reporter to make an appropriate recommendation on this issue.
**COUNTRYSIDE AREA**

LWD003 – Glenduckie Farm, Lindores

SEPA (3560): Support for the FIFEplan position is noted.

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**Reporter’s conclusions:**

**NEWBURGH**

Newburgh issues

1. Housing market areas, not individual settlements, are the geographical areas used to determine housing land requirements. Scottish Planning Policy explains that one of the roles of the planning system is to identify a generous supply of land for each housing market area to support the achievement of the housing land requirement. The overall adequacy of the supply across this part of the plan area is considered in detail at Issue 2(b).

2. Newburgh is within the Cupar and North West Fife Housing Market Area. TAYplan sets out the average annual housing market build rate required across the housing market area to ensure an appropriate supply of housing land is provided. It focuses the majority of new development on the principal settlements in this part of the plan area, particularly at Cupar, where the Cupar North Strategic Development Area (which has an estimated capacity of 1400 houses) is proposed. Newburgh is also identified as a principal settlement (tier 3) in TAYplan and, as such, it is considered capable of having the potential to play an important but more modest role in the regional economy, and of accommodating a small share of the region’s additional development (which is more about sustaining it). In principle, I therefore consider that Newburgh would be an appropriate location to accommodate further development.

3. The adopted local plan states that Newburgh is well located to have a strong functional role, both within Fife and looking outwards to Perthshire, and I note that the spatial strategy in the proposed plan is clear in identifying Newburgh as one of the settlements in the housing market area to have development proposals because of the availability of services and its ability to accommodate development of the scale proposed. I do not find the housing allocations proposed in Newburgh unreasonably large or disproportionate to the size of the settlement. Newburgh would remain small. I note that the largest housing allocations at NEB 001 (South of Cupar Road), which is also in the adopted local plan, and NEB 002 (Land north of Cupar Road), are to come forward within a joint development framework providing a mix of uses, which could help realise the potential of Newburgh, supporting and extending its services and facilities. I accept that there is a preference to focus development on brownfield land, but there are insufficient brownfield sites to accommodate the housing land required. Within that context, it is necessary and acceptable to allocate greenfield sites as well.

4. I find that the proposals for Newburgh are consistent with the spatial strategies of TAYplan, the adopted local plan and the proposed plan. In the absence of a shortfall in housing land within the housing market area, I can see no compelling policy requirement to make further housing allocations within a settlement where reasonable provision has already been made for expansion. This could delay the delivery of the housing...
allocations proposed in Newburgh. Furthermore, the reduction or removal of NEB 001 (South of Cupar Road) and/or NEB 002 (Land north of Cupar Road) with the intention of facilitating further development of land at Auchtermuchty would be an arbitrary, unjustified measure, which would not properly reflect the spatial strategies that have evolved.

5. I consider the specific circumstances of the sites allocated in the proposed plan in Newburgh, and others, further below.

6. Overall, no adjustment is required to the proposed plan.

NEB 001: South of Cupar Road, and NEB 002: Land north of Cupar Road

7. I consider NEB 001 and NEB 002 together because of the requirement in the proposed plan for a joint development framework.

8. NEB 001 and NEB 002 are located on the eastern and south eastern edge of Newburgh, with the former to the south of Cupar Road and the latter to the north of it. NEB 001 extends to 13 hectares in total, with a housing area of just over 9.5 hectares, and it comprises fields which slope gently up towards the south. NEB 002 extends to just under 2 hectares, and comprises a low lying, flat field, which stretches from Abbey Road to the north to Cupar Road to the south. The allocation of NEB 001 for housing in the proposed plan is a continuation of its housing allocation in the adopted local plan albeit that, in the latter plan, the eastern most part of the site is identified as a post 2018 phase of development. The allocation of NEB 002 for housing in the proposed plan is a change from its countryside designation in the adopted local plan. The estimated capacity of NEB 001 is 225 houses, and that of NEB 002 is 50 houses. The sites contribute to meeting the housing land requirement, and their development would allow for the expansion of Newburgh, in line with the proposed plan’s settlement strategy. The other uses on NEB 001 would comprise employment (1.5 hectares), a cemetery extension (1.2 hectares) and an expansion of the primary school (0.6 hectares).

9. The existing settlement edge of this eastern and south eastern part of Newburgh is unattractive, untidy and ragged. I consider that these 2 allocations provide an opportunity to improve and rationalise the boundary at this important gateway to the settlement. NEB 001 is also well contained by the hills to the south, which form a distinctive feature above Newburgh, and the elevated railway line. While NEB 002 was previously included in a local landscape area in the adopted local plan, this designation would not be undermined by the loss of a small part of it immediately adjacent to the settlement boundary. Additionally, I consider that the allocation of NEB 002 would allow an appropriate link to be created between Newburgh and Lindores Abbey Farm steading, which I recommend below be included within the settlement boundary. I believe that both allocations represent reasonably natural extensions of Newburgh, and are a good fit with the existing settlement. I am not persuaded that it would be reasonable to regard development of either allocation as likely to be either unduly or unacceptably prominent. While the allocations may include productive or prime quality farmland, as they form a justified part of the settlement strategy, I consider it appropriate to retain both in the proposed plan.

10. I am not persuaded that the allocations should be removed from the proposed plan on the grounds of coalescence between Newburgh and Burnside. I believe that NEB 001 has sufficient space to allow reasonable separation between the 2 to be
maintained, and I note that the proposed plan includes such separation as a development requirement for this allocation. I also consider that the proposed plan shows that reasonable separation is provided between the eastern edge of NEB 002 and Burnside. The design of the development on the 2 allocations would be subject to the requirements arising from the joint development framework, the requirements of the proposed plan, and the requirements of detailed planning permissions. In preparing the development framework, I believe that it is important that the local community are consulted in order to ensure that its views are properly taking into account. This should be a further requirement of the proposed plan. If sensitively designed with regard to building layout, form, type and height, I see no reason why an acceptable development, which protected the identity of Newburgh, could not be achieved over the 2 allocations. I am not persuaded that there would be likely to be an adverse effect on the character or appearance of the conservation which is more in the centre of Newburgh, and separated from the area of the allocations. I also consider that the location and extent of the allocations reasonably take into account the presence of the nearby historic Lindores Abbey, which is both a scheduled ancient monument and a listed building.

11. The proposed plan requires that vehicular access be taken to the allocations from Cupar Road (A913). I believe that it would be reasonable to provide access points from this road, and that they could help integrate development with facilities and services in Newburgh. In preparing the proposed plan, I note that the council has consulted infrastructure and service providers, such as the roads authority, the education authority, NHS Fife and Scottish Water, and that none have objected in principle. The council has indicated, and I accept, that where deficiencies and capacity issues have been identified, provision could likely be made to mitigate the effects of development. While this may have a bearing on the pace of development, I am not persuaded that the 2 allocations, either individually or together, could justifiably be rejected on the grounds of infrastructural or service constraints. Neither could they reasonably be rejected on the grounds of existing congestion in the centre of Newburgh. I do not consider that the development requirements set out in the proposed plan for the 2 allocations are onerous for a development of the scale proposed. I also consider this to be an attractive location for development on the edge of Newburgh, and believe it to be at least as marketable as other locations in settlements of a similar size in the wider area. In all the circumstances, I see no good reason to recommend that the capacity of the allocations be reduced to the suggested figure of 100 houses. This figure appears to be based on the outcome of a survey carried out around 10 years ago.

12. I consider the proposal to extend NEB 002 further to the east to be inappropriate. It appears that it would more than double the size of the allocation, and it would result in the loss of the remaining low lying fields at this location. I am concerned at the effect that this could have on the landscape setting of Newburgh. Most importantly, I consider that the loss of these particular fields would inappropriately restrict views, and the setting, of the nearby historic Lindores Abbey. It has also not been demonstrated that the proposed extension of NEB 002 is required to help a more co-ordinated approach to the delivery of the mix of uses proposed over both NEB 001 and NEB 002. For these reasons, I believe that the site of the extension should be retained as open fields, which are designated as countryside and a part of the local landscape area.

13. Overall, an adjustment is required to the proposed plan, as set out below.
### NEB 004: Newburgh Rail Halt

14. NEB 004 is situated on the western edge of Newburgh, and straddles Abernethy Road (A913). It extends to one hectare, and comprises a cleared area adjacent to the railway line on the southern side of the A913, and a car park on the northern side of the A913. A station previously occupied the cleared site. Its allocation as a rail halt in the proposed plan is essentially a continuation of its transportation (rail halt) allocation in the adopted local plan. The proposed plan indicates that the site is included in the SEStran Regional Transport Strategy Delivery Plan 2008-2023, but that it is not currently supported in the Strategic Transport Projects Review, and that Transport Scotland has no commitment towards funding its delivery.

15. Transport Scotland explains in its representation that, on behalf of Scottish Ministers, it is responsible for the development of the rail network in Scotland, and that their investment priorities to 2032 are set out in the Strategic Transport Projects Review. Scottish Planning Policy indicates that development plans should set out a spatial strategy which is both sustainable and deliverable, providing confidence to stakeholders that the outcomes can be achieved. It also indicates that the strategic case for a new station should emerge from a complete and robust multimodal transport appraisal in line with Scottish Transport Appraisal Guidance, and that agreement should be reached with Transport Scotland and Network Rail before such proposals are included in a development plan.

16. Transport Scotland indicates that it commented in 2014 on a report commissioned by SEStran and Tactran on the potential of a rail station at Newburgh, advising that it could have a negative impact on the Highland Main Line improvements projects, which is one of the priorities identified in the Strategic Transport Projects Review. I note that the proposed station was considered at the examination into the adopted local plan, and that it was retained, subject to changes that recognised, amongst other things, that there was no funding commitment to it, and that referred to Transport Scotland’s policy and approach to new stations. I also note that a 2011 review concerning Newburgh rail station, prepared for Newburgh Community Trust, concluded that the results of a household questionnaire survey demonstrated overwhelming community support for the station, but that the projected rail patronage figures should be treated with caution. Additionally, local community work has been undertaken on possible timetable scenarios, which seek to demonstrate that a station could be accommodated at Newburgh.

17. While the station is supported through TAYplan and clearly has much local support, given Transport Scotland’s comments on the report commissioned by SEStran and Tactran, the apparent lack of funding, and the lack of agreement with Transport Scotland, I consider that there is considerable uncertainty about this proposal and whether it can realistically be delivered. The inclusion of such a proposal does not provide confidence for stakeholders that the proposed plan’s desired outcomes can be achieved in a reasonable timescale. In all the circumstances, I do not consider that such a proposal complies with Scottish Planning Policy, or that it should be included in the plan in the form proposed.

18. Taking this conclusion into account, and bearing in mind TAYplan’s support, and the potential benefits of improving connectivity between Newburgh and the main centres and supporting modal shift, I believe that it would be reasonable to change this proposed rail halt from a firm proposal to a safeguarding, which indicates that it is a longer term
council aspiration, which is not supported by the Strategic Transport Projects Review, and which has no commitment or approval from Transport Scotland. The reference in the proposed plan to Transport Scotland’s policy on promoting better utilisation of the existing network is unnecessary and should be deleted. The plan also indicates that proposed development in Newburgh at NEB 001 may increase demand for a new station, but I doubt whether the estimated capacity of this allocation (225 houses) would be sufficient to justify its provision, and this paragraph should be removed. This remains the case even taking into account the additional housing proposals in Newburgh at NEB 002 and NEB 003 which, combined, have an additional estimated capacity of 58 houses. Given the uncertainty regarding this proposed development and its change of status, the proposed site shown in the inset map for the proposed rail halt should become an indicative location, rather than have precisely defined boundaries. For the same reason, the green network priorities for NEB 004 should be removed.

19. Overall, adjustments are required to the proposed plan, as set out below.

Non-inclusion of sites: LDP-NEB001 (Banklands, Woodriffe Road)

20. The site lies on the south western edge of Newburgh, immediately to the east of the housing on Banklands. It extends to just under 2 hectares, and comprises scrubland, with trees along its southern boundary. The site lies outwith the settlement boundary, and its designation as countryside in the proposed plan is a continuation of its countryside designation in the adopted local plan. The representation indicates that the site has a capacity for development of around 30 houses. Outline planning permission was granted for residential development on the site in September 1979. A subsequent application to renew the permission was refused in July 1990 due to drainage constraints, which it appears were subsequently resolved. Further submissions have been made since this time seeking the allocation of the site.

21. I note that the existing settlement adjoins a significant part of the site boundary (3 sides), with residential uses on the western and northern boundaries, which all benefits the proposal. The third, southern side, contains a play park and a single house, and is more on to open countryside. While I do not regard the site as infill, I believe that the housing on 2 sides would be likely to help absorb a sensitive development into the existing built up area. It could also be argued that development here would provide a more rational settlement boundary. The site sits on a steep, south facing, visually prominent site. This could be a potential constraint on its development, but nothing in the evidence before the examination shows that it would be a major obstacle.

22. Local facilities and services, including public transport, are not so easily accessed from the site on foot because of the area’s sloping topography. While the site would be relatively well integrated with the immediate area, it would not be so well integrated with Newburgh as a whole. I consider that vehicular access to the site could be a challenge because of the narrow, steep roads in the vicinity, and that the council’s site appraisal highlights a possible issue with sewer capacity. I accept that these matters could potentially be resolved, but I believe that this would have to be more fully demonstrated before any allocation was made.

23. I acknowledge that there is a shortfall in meeting the housing land requirement in the SESplan area of Fife together with the uncertainties expressed with regard to the level of that shortfall under Issue 2(b) Homes. However, the conclusions find that adequate housing land has been provided in the TAYplan area in line with requirements.
set out in the strategic development plan. In addition the 2015 Housing Land Audit has found that there is a 5 year effective housing land supply in both the Cupar and North West Fife and St Andrews and North East Fife Housing Market Areas. Accordingly, there is no strategic numerical justification to allocate further sites for housing within the TAYplan area. While I acknowledge that Newburgh is identified as a principal settlement in TAYplan, I believe that the focus should remain on the delivery of the allocations in the proposed plan which would deliver a mix of uses, as well as a significant number of houses, to the benefit of the settlement. I am not persuaded that it has been demonstrated that Banklands is a site which should be preferred to the allocations made. In the circumstances, I do not consider that it would be appropriate to allocate the site at Banklands for housing at this time.

24. Overall, no adjustment is required to the proposed plan.

Non-inclusion of sites: Lindores Abbey Farm Steading

25. The site is situated on the eastern boundary of Newburgh, on the southern side of Abbey Road, opposite Lindores Abbey, which is a scheduled ancient monument and category A listed building. Planning permission was granted for the erection of 7 dwellings on the site of the steading in June 2012. Planning permission has subsequently been granted for change of use and conversion of the steading to form a distillery, visitor centre and warehouse with associated access and car parking in September 2015. The representation requested an extension to the settlement boundary to incorporate the site shown on an accompanying plan. A follow up was received to this representation in December 2015, well after the commencement of the examination, which sought to extend the area included within the settlement boundary to reflect the planning permission granted for the distillery, and to allocate the site for distillery and associated infrastructure.

26. In response to the representation itself, the council indicated that there was merit in adjusting the settlement boundary to include land at the abbey farm steading. Given the planning permissions that have been granted in relation to the steading, I agree that it would be appropriate to extend the settlement boundary. I prefer the boundary shown on the plan accompanying the original representation. It reasonably reflects the settlement edge on the northern side of Abbey Road (which includes the abbey within the settlement), it relates well to housing allocation NEB 002 (Land north of Cupar Road) and the line of Abbey Road, and it is a reasonable continuation of the rear building line of the western end of the steading buildings. The site plan for the planning permission for the distillery shows that the distillery takes in an additional area of irregularly shaped ground to the south west. The plans for the distillery show that this area would be used mainly as an orchard, and a small area would be used as part of an internal access road. The orchard would extend further north towards Abbey Road, and would include a pond. The orchard and the internal access road could reasonably be included in either the countryside or the settlement. I believe that the additional area of ground shown in the planning permission should fall outwith the settlement boundary, and in the countryside and local landscape area, because it is low lying and links well with the low lying fields to the south, which are an important feature and contribute to the landscape setting of Newburgh. It would be inappropriate to allocate the site for distillery and associated infrastructure because the categories used in the proposed plan for allocations are not so specific, but are general in nature. In the circumstances, I believe it best to do no more than extend the settlement boundary as shown in the plan accompanying the original representation.
27. **Overall, an adjustment is required to the proposed plan, as set out below.**

<table>
<thead>
<tr>
<th><strong>Reporter's recommendations:</strong></th>
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<td>I recommend that the following modifications be made:</td>
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1. In references NEB 001 (South of Cupar Road) and NEB 002 (Land North of Cupar Road), pages 145 and 146, adjust the first sentence of the first paragraph of the development requirements in each so that it reads:

   “A development framework covering sites NEB 001 and NEB 002 should be prepared by the developer for Fife Council approval with input from all land owners and following consultation with the local community…”

2. In reference NEB 004 (Newburgh Rail Halt), page 146, delete the description “New rail halt with park & ride” and replace it with “New rail halt with park & ride safeguarding.”

3. In reference NEB 004 (Newburgh Rail Halt), page 146, adjust the first paragraph of the other information so that it reads:

   “The council has a longer term aspiration to see a rail halt provided at Newburgh. The project is not supported by the Strategic Transport Projects Review, and there is currently no commitment or approval for it from Transport Scotland.”

4. In reference NEB 004 (Newburgh Rail Halt), page 146, delete the second and third paragraphs of the other information, and the green network priorities.

5. In the Inset Map for Newburgh & Burnside, delete the allocation shown for NEB 004 (Newburgh Rail Halt), and replace it with a combination of a circle for indicative location and purple for transportation proposal.

6. In the Inset Map for Newburgh & Burnside, extend the settlement boundary for Newburgh to include the Lindores Abbey Farm Steading as shown on the plan (dated December 2014), accompanying representation 1970.
<table>
<thead>
<tr>
<th>Issue 20</th>
<th>Tay Bridgehead Area</th>
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<tr>
<td><strong>Development plan reference:</strong></td>
<td>Settlement Plans (Tay Bridgehead Area): Balmullo (page 30), Drumoig (page 64), Gauldry (page 86), Guardbridge (pages 98-100), Leuchars (page 126), Newport on Tay and Wormit (147-148), Tayport (176-177), and Countryside Area (Proposal LWD 017, page 185)</td>
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<td><strong>Reporter:</strong></td>
<td>Dilwyn Thomas</td>
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**Body or person(s) submitting a representation raising the issue (including reference number):**

**BALMULLO**

- HW Melville & Sons (Balmullo) Ltd (675)
- Linlathen Developments (Tayside) Limited (2134)
- A & J Stephen Ltd (2143)

  **BLO 001: Balmullo Farm**
  - SEPA (3308)

  **BLO 002: Land at Burnbrae Nursery, Clay Road**
  - Ann Gibson (32)
  - A Taylor (1264)
  - A & J Stephen Ltd (2143)
  - Steven Martin (2174)
  - SEPA (3309)

**DRUMOIG**

- Drumoig Residents Association (1313)
- Parkhill Construction Services Ltd and Drumoig Developments Ltd (3283)
- SEPA (3350)

  **DRG 001: Drumoig**

**GAULDRY**

- Kilmany Scottish Produce Ltd and D King Properties (Scotland) Ltd (2161)

  **GAU 001: Priory Road North**
  - A & J Stephen Ltd (2138)
  - The Woodland Trust Scotland (2890)

**NEW 001: Ericht Road**

- James Rough (615)
- Stewart McKiddie (1909)
- Bill and Jeannie Nixon (2249)
- SEPA (3581)

**NEW 002: South of Victoria Park**

- E O'Riordan (92)
- SEPA (3582)

**NEW 003: North West of Forgan Roundabout**

- E O'Riordan (93)
- Stewart McKiddie (1922)
- SEPA (3583)

**WOR 001: Wormit Farm (Housing)**

- Stewart McKiddie (1886)

**WOR 002: Wormit Sandpit**

- Stewart McKiddie (1889)

**WOR 003: South of Wormit Farm**

- Peter & Wendy Baylis (1201)
- Stewart McKiddie (1894)
- Bill and Jeannie Nixon (2245)

**WOR 004: Wormit Farm (Rail Halt)**

- Adam Priestley (Transport Scotland) (3226)
## Provision of the development plan to which the issue relates:

Settlement Plans (Tay Bridgehead Area): Balmullo, Drumoig, Gauldry, Guardbridge, Leuchars, Newport on Tay and Wormit, Tayport, Countryside Area
### Planning authority's summary of the representation(s):

**BALMULLO**

**Balmullo Issues**

HW Melville & Sons (675), A & J Stephen Ltd (2143): Concerns over effectiveness and delivery of sites identified in the Proposed Plan. Scale of development proposed in Balmullo through the Proposed Plan is insufficient to support local services and address housing requirement.

A & J Stephen Ltd (2143): Other similar or smaller settlements have greater levels of growth planned.

HW Melville & Sons (675): A review of potential candidate sites failed to consider the advantages to the area in allocating sites outwith the Strategic Land Allocations. Seek a re-examination of housing land supply strategy for outlying villages within the housing market area and allocation of a larger release of land.

**BLO 001: Balmullo Farm**

SEPA (3308): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken.

**BLO 002: Land at Burnbrae Nursery, Clay Road**

Mr & Mrs A Taylor (1264): Support the proposed allocation for residential development of land at the former Burnbrae Nursery. The site is in the ownership of Mr and Mrs Taylor, who are fully committed to its release for development in the short term. Site comprises predominantly brownfield land, adjacent to the settlement boundary on its north and west sides, and contains several disused buildings and glasshouses. Perimeter hedging gives a degree of screening. It is agreed that the site is suitable for development and that there is need for short-term release of small scale development opportunities. The allocation of the site is supported by criteria set out in Scottish Planning Policy. This allocation of this site at Clay Road is of a scale which will not undermine the delivery of St Andrews West and accords with the spatial strategy set out in the Proposed Plan. The site is effective in terms of PAN 2/2010 and free from constraint.


Ann Gibson (32): Concerns over access. Clay Road is already a busy road and safety is an issue with through traffic. Concern over impact on the peace and quiet that living in Clay Road provides. Facilities such as local schools are limited.

Steven Martin (2174): Concerns over the location of vehicle access and egress to/from Clay Road to the proposed site as the road is already extremely busy and we have had several near misses whilst exiting our driveway onto the main road. Any further housing development will undoubtedly increase the amount of traffic using Clay Road and impact on the quiet surroundings.
SEPA (3309): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken. Support the inclusion of a Site Requirement for a buffer strip along the watercourse as this measure will help protect and improve the water environment.

Sites (not in the Proposed FIFE plan) proposed by Objectors

Candidate Site LDP-BLO001

HW Melville & Sons (675): Seek the allocation (as owners) of candidate site LDP-BLO001 at the south of Balmullo (see Site Plan attached to representation) for the following reasons: The site is effective and deliverable for residential development; proposed development would support local services and facilities; developer interest from Lundin Homes (submission attached); site is serviced – water, electricity etc.; existing roundabout was designed to have a fourth arm into the site; site is capable of phased delivery; no known flood events; potential linkage to Burnbrae Nursery site; site capable of delivering on-site affordable housing; can be designed to avoid adverse visual and landscape impact; linkages to the centre of the village can easily be provided; potential to deliver active wildlife corridor and enhancement of the burn (which is under the ownership of the site promoter); Balmullo is an attractive development location with high accessibility to areas of employment and well served by public transport. Fife Council has failed to record or assess submissions made by HW Melville & Sons.

The submission is accompanied by copies of previous comments on the Local Development Plan.

Candidate Site LDP-BLO003

A & J Stephen Ltd (2143): Seek the allocation of candidate site LDP BL0003, Lismore (see Supporting Statement attached to representation) for housing for the following reasons: no significant landscape impacts; suitable vehicular access available and in control of site A & J Stephen Ltd; The previous Local Plan examination did not identify site specific issues but highlighted potential adverse impact on the landscape setting of Balmullo; deliverable and self-contained extension to Balmullo; Balmullo has a market for, and recent history of growth, and is a thriving community with a range of facilities and good accessibility to nearby settlements; the site location, topography and defined boundaries are suitable for residential use with close links with the settlement (vehicular access from Pitcairn Drive and pedestrian links through Burnside); the site is within the control of A & J Stephen, free from constraint and deliverable; Masterplanning and layout will provide a landscape setting with visual containment.

Candidate Site LDP-BLO004

A & J Stephen Ltd (2143): Seek the allocation of candidate site BL0004, Land at Main Street (see Supporting Statement attached to representation) for housing for the following reasons: support and endorse Fife Council’s own assessment which recognises the potential for development of the site; deliverable and self-contained extension to Balmullo; Balmullo has a market for, and recent history of growth, and is a thriving community with a range of facilities and good accessibility to nearby settlements; site provides an opportunity to enhance setting of Balmullo through extensive planting of beech hedges and other selected indigenous species; Site is close to existing facilities;
the site is within the control of A & J Stephen, free from constraint and deliverable; preliminary discussions have been held with Fife Council to facilitate on site delivery of affordable housing.

Other Sites

Linlathen Developments (Tayside) Ltd (2134): Seek the allocation of land at 3 separate sites at Balmullo for residential development (see supporting submission attached to representation). Site1 would have least visual impact as it is screened from the A914 by a ridgeline. Site 2 could be considered for development but is likely to be more contentious and would require additional structure planting. Partial development of the site closest to the village edge would be more readily justified. Site 3 would have the highest level of visual impact so it is difficult to envisage a convincing case being made at this time, in advance of the development of Sites 1 and 2. Balmullo is primarily of residential character with some amenities and a primary school. The sites can accommodate a range of densities of residential accommodation.

DRUMOIG

DRG 001: Drumoig

Parkhill Construction Services Ltd and Drumoig Developments Ltd (3283): Support the retention of the existing Local Plan allocation for housing/commercial leisure/community facilities and welcome the increase in site area for Proposal DRG001 which aligns with the conceptual masterplan previously put forward at the Development Strategy consultation stage. Removal of the previous restriction on timescales is supported. Parkhill Construction Services Ltd and Drumoig Developments Ltd are fully committed to the site’s release in the short term. Following extensive and generally positive consultation with the local community, an application for mixed use leisure and residential development has been submitted. The proposed development seeks to fulfil the aspirations of the Adopted Local Plan and emerging Local Development Plan, and would assist in making Drumoig a more rounded and sustainable place to live.

Drumoig Residents Association (1313): It is our understanding that this allocation is predicated on current applications for a mixed use development and 8-10 mid-market rental properties. There has been a mixed response from the residents of Drumoig to the proposals. There is:

- general support for proposals for the driving range and improvements to the hotel;
- a mixed view on proposals for new housing and for retirement homes;
- fairly strong, and growing, opposition to the proposed holiday chalets, seen by many as an undesirable change to the nature of Drumoig.

Other areas of concern include: overall scale of the development; the standard of new houses; the long term status of the proposed retirement homes and holiday chalets due to suspicion that these may become low cost housing; commitment to the additional facilities (shop, sporting facilities, café etc.); commitment to other community facilities (car park near to the local bus stop, a play area, picnic areas, paths); a long term landscaping plan and a commitment to the maintenance of undeveloped land, potentially as community land; assurances on the viability of development and the suitability of the location for retirement home; mixed views on the proposed mid-market rental units; road safety at the entry to A914 junction; duration and impact of construction; location of the
proposed driving range manager’s house. The driving range has reopened and the par-3 golf course is well under construction irrespective of housing development.

SEPA (3350): Support the inclusion within the Development Requirements for a Flood Risk Assessment (FRA) to be undertaken. Support the inclusion of a Site Requirement for a buffer strip along the watercourse as this measure will help protect and improve the water environment.

GAULDRY

GAU 001: Priory Road North

A & J Stephen Ltd (2138): Proposal GAU001 (Priory Road North) should be extended to include the land immediately to the north of the site with a total capacity of 40 units (see Supporting Statement attached to representation). Gauldry has numerous local facilities and access to wider facilities; it has a history of delivering local scale housing; it can assist in delivering the TAYplan housing requirement and provide range and choice within the St Andrews Housing Market Area. This extension could accommodate the units lost through the deletion of the adopted Local Plan proposal GAU02 (Priory Farm Steading).

The proposed extension to the proposal is within identifiable topographical and natural boundaries. The adopted local plan recognises that although Gauldry is surrounded by a Special Landscape Area, this does not restrict the principle of some incremental development being acceptable in the most appropriate locations. The proposed extension would incorporate a landscaped setting along the line of the Right of Way which defines the site boundary to the north. A well thought out design could maximise the potential for the site without conflicting with the principle of visual containment without breaking the skyline when viewed from the north, this issue could be addressed by landscaping and the scale of building. The land is effective, free from constraint and deliverable.

The Woodland Trust Scotland (2890): Proposal GAU001 is adjacent to an area of ancient woodland. Object to development on this site as it would lead to loss or damage to ancient woodland and recommend that the site is not allocated unless the protection of the adjacent woodland can be guaranteed. If the site is to be identified for development a 10m buffer between the proposed development and woodland should be identified as a development requirement. Recommend that appropriate survey work is carried out if protected species are present on site or adjacent to the site.

Sites (not in the Proposed FIFEplan) proposed by objectors

Kilmany Scottish Produce Ltd and D King Properties (Scotland) Ltd (2161): Object to the non-allocation of part of candidate site LDP-GAU002 Balgove Road. The area of land now being promoted for development has been reduced to 1.8 hectares to accommodate up to 40 units. This size and scale of development is considered appropriate and addresses issues of scale raised in the site assessment. Gauldry is identified as having limited services; these will only be improved through investment in the area. Allocating sufficient effective housing land will assist in increasing the population within Gauldry and bringing investment to the area. Proposal GAU 001 is currently the only housing allocation identified in Gauldry and there has been no progress on the delivery of this site. FIFEplan has not allocated a sufficient supply of
effective housing land within the Gauldry area. Allocating candidate site LDP-GAU002 will assist in achieving the housing land requirements in the St Andrews and East Fife Housing Market Area and the Gauldry area.

Candidate site LDP-GAU002 can be developed to complement and enhance the existing settlement pattern and landscape character of the area, it is within walking distance of existing local community facilities, will provide affordable housing and the increased population created will assist in supporting local shops, businesses and services. A transport statement has been provided and demonstrates that the site is accessible by sustainable modes of travel; integrates well within the existing transport network and can be accessed safely from the adjacent road network by private vehicles without compromising the safety or efficiency of existing road users. The submission also includes attachments relating to landscape, drainage, topography, and a letter of support from Kingdom Housing. This site fully accords with the criteria for an effective housing site.

GUARDDBRIDGE

Guardbridge Issues

Kingdom Housing Association (1179): FIFEplan should acknowledge the planning approvals 14/01288/FULL and 13/01004/FULL for 66 affordable houses at Toll Road, Guardbridge.

NHS Fife (3847): Potential additional 406 houses in the area could impact on healthcare services.

GUA 002: Motray Park

McHale Enterprises Ltd (1588): Planning permission was granted for this site in October 2014. The development priorities for this site should be amended to refer to this consent. Object to the first bullet in the green network priorities to establish an access route along the disused railway line. McHale enterprises Ltd do not control this land and the requirement is not part of the planning permission granted. This bullet point should be deleted. Object to the text ‘to establish a short round route’ in the second bullet in the green network priorities. The proposal for this site includes a public open space and a recreational route can be provided, however it will not become a short round route as the link along the disused railway cannot be provided.

SEPA (3458): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site and the requirement for a buffer strip along the watercourse to help protect and improve the water environment.

GUA 003: Seggie Farm

Seggie Farm (1070): Support Proposal GUA 003. Steps are being taken to bring forward development on this site along with Proposal GUA 005.

The Woodland Trust Scotland (2896): Proposal GUA 003 is adjacent to an area of ancient woodland. Object to development on this site as it would lead to loss or damage to ancient woodland and recommend that the site is not allocated unless the protection of the adjacent woodland can be guaranteed. If the site is to be identified for
development a 10m buffer between the proposed development and woodland should be identified as a development requirement. Recommend that appropriate survey work is carried out if protected species are present on site or adjacent to the site.

GUA 004: Site of Former Curtis Fine Papers

University of St Andrews (2217): Support the allocation of Proposal GUA 004, Site of Former Curtis Fine Papers for Employment use subject to the following amendments to the development requirements:

- The requirement for a development framework should be deleted, it is considered that the University’s ‘aspirations’ for the site have clearly been set out and the approved planning permission in principle (14/01933/PPP) has established a clear understanding of the approach to development in line with the overarching land use objectives for the site which are in line with the FIFEPlan Proposed Plan allocation.
- The requirement for a minimum of one hectare (net developable area) of serviced employment land should be removed. The planning permission in principle consent sets out a strategy for the site which would deliver more than the one hectare of employment land identified in FIFEplan, this can be realised at a detailed planning stage so it is not necessary to set this requirement out as part of the site allocation.

SEPA (3459): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site and the requirement to consider through a feasibility study, the potential for restoration and improvement of the water environment through the site design.

GUA 006: Avalon Business Park

SEPA (3460): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site

LEUCHARS

Leuchars issues

Athole Stewart (1653): The protected open space identified along Main Street near the Commercial Arms has been granted planning permission (11/02818/FULL). This may impair the off road cycle route proposed within Proposal LEU 001 and the connection to the core path.

LEU 001: The Castle Field/Doocot Field

Athole Stewart (1381, 1474): Object to Proposal LEU 001 on the following grounds: the impact of traffic (pedestrian safety, noise, pollution and congestion), heritage (both built and natural) and failure to adhere fully with green network priorities. The potential traffic issues could be reduced if candidate site LDP-LEU002 (a) and additional land in the same area were allocated for development, spreading the traffic between the A919 and the A914. The area covered by existing local plan Proposal LEU 01 (the Doocot Field) should be excluded from development to fully protect the integrity of the A listed Doocot building and Leuchars Castle Motte, and to fully meet the need for greenspace and public access. The loss of development on this site would be mitigated by allocating candidate site LDP-LEU002 (a). Fife Council land at Fern Place should be used to
provide an alternative access to the proposed greenspace (see supporting submission attached to representation) avoiding crossing Main street at a point where the view is restricted.

Carroll Finnie (1373): Object to Proposal LEU 001 on the following grounds; Leuchars does not have the infrastructure (schools and healthcare services in particular) to support the increased development (particularly when the army personnel arrive in April 2015); the roads will not be able to cope with the additional traffic; Leuchars Castle Doocot would be hidden behind development so it would not be visible from the gateway to the village.

Leuchars Community Council (2343): Object to the boundary shown for Proposal LEU 001. The community council thinks the impact of increased traffic generated by the proposal and the army might be lessened if FIFEplan just allocated candidate sites LDP LEU 002 (a & b); this would also be more effective in protecting the Doocot and Castle Motte setting and meeting the green network aspirations. The scale of the proposal is high. The number of Army personnel expected in 2015 is much less than the number of departing RAF personnel, which suggests there will be surplus housing in the near future which could be utilised by Fife Council working with the Defence Infrastructure Organisation.

NEWPORT ON TAY AND WORMIT

Newport on Tay Issues

James Rough (614): Objects to the scale of development proposed in Newport (and Wormit) for the following reasons: the scale of development proposed exceeds predicted demand so must be to attract people into the area, what will these people do? The local infrastructure (including children’s play and community facilities) does not have the capacity to support the major housing developments proposed; The existing roads already struggle to cope with the traffic and are in poor condition and there would be safety concerns both during and after any development; School capacity will be an issue particularly secondary school provision as the new High School in St Andrews has yet to be provided; The local infrastructure is struggling to support the existing population and should be improved before it is increased through development.

Bill and Jeannie Nixon (2251): Proposals WOR 001, WOR 002, WOR 003, NEW 001 and NEW 002 should be evaluated in relation to each other, rather than as separate, independent proposed development sites. When considered together the scale of development proposed would increase the area by approximately 50%. The adverse impacts seem much clearer than any possible benefits. The community infrastructure and existing roads could not support development on this scale with parking and congestion already being an issue in the villages.

NEW 001: Ericht Road

James Rough (615): Object to the allocation of Proposal NEW 001 for the following reasons: it is a greenfield site and should not be developed until all brownfield and derelict sites are developed; the local infrastructure (including children’s play and community facilities) does not have the capacity to support the major housing developments proposed; The existing roads already struggle to cope with the traffic and are in poor condition and there would be safety concerns both during and after any
development; School capacity will be an issue particularly secondary school provision as the new High School in St Andrews has yet to be provided; The local infrastructure is struggling to support the existing population and should be improved before it is increased through development.

If the allocation is to remain the following should be taken into account: the proposed density is too high; the right of way to the west of the site should be improved; there are parts of the site which are of habitat value and amenity value, Particularly south of the path, this area should be retained as a wildlife corridor between the nature trail to the north of the site and field and woodland to the south and should be widened to provide a screen and valuable open space. The proposed landscaped edge to the south must take care not to further reduce sunlight to the houses by planting trees above any new houses. Landscaping would be more appropriate to adjacent to the path on the west of the area.

Stewart McKiddie (1909): Object to proposal NEW 001. The proposal is on greenfield land and would increase congestion along Flass Road. Brownfield sites should be developed before greenfield. If the allocation remains then the following text should be added: ‘To be developed only once a substantive start to construction has been made at both sites WOR 001, Wormit Farm (Housing) and Wor 002, Wormit Sandpit.’ And the proposal should be referenced as WOR rather than NEW.

Bill and Jeannie Nixon (2249): Object to proposal NEW 001 for the following reasons: The proposal is on a greenfield steeply sloping site; Newport and Wormit lack the infrastructure to support additional development of this scale; secondary school capacity will be an issue; the narrow residential Flass and Erich Road already struggle to accommodate existing levels of traffic, the proposal would cause greater congestion and hazard for children going to the primary school; the site is bordered by nature trails and wildlife corridors, these should be preserved and enhanced.

SEPA (3581): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site and the requirement for a buffer strip along the watercourse to help protect and improve the water environment.

NEW 002: South of Victoria Park

Dr E O’Riordan (92): Development should not lead to increased traffic on residential roads in particular Linden Avenue, Station Brae and Victoria Street, and close to the primary school. Need to ensure that traffic does not use these roads to access the A92.

SEPA (3582): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site

NEW 003: North West of Forgan Roundabout

Dr E O’Riordan (93): Development should not lead to increased traffic on residential roads in particular Linden Avenue, Station Brae and Victoria Street, and close to the primary school. Need to ensure that traffic does not use these roads to access the A92.

Stewart McKiddie (1922): There is a danger of flooding on this site although there has been recent drainage works. The proposed cycling/walking route to Forgan Roundabout would not lead anywhere apart from the bus stops; it should be extended towards the old
Forgan smithy and cemetery. The current footways are hazardous and in poor condition.

SEPA (3583): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site and the requirement for a buffer strip along the watercourse to help protect and improve the water environment.

**Wormit Issues**

James Rough (612): Objects to the scale of development proposed in Wormit (and Newport) for the following reasons: The local infrastructure (including children’s play and community facilities) does not have the capacity to support the major housing developments proposed; The existing roads already struggle to cope with the traffic and are in poor condition and there would be safety concerns both during and after any development; School capacity will be an issue particularly secondary school provision as the new High School in St Andrews has yet to be provided; The local infrastructure is struggling to support the existing population and should be improved before it is increased through development.

No indication has been given as to how the sites were selected in Wormit.

Bill and Jeannie Nixon (2242): Proposals WOR 001, WOR 002, WOR 003, NEW 001 and NEW 002 should be evaluated in relation to each other, rather than as separate, independent proposed development sites. When considered together the scale of development proposed would increase the area by approximately 50%. The adverse impacts seem much clearer than any possible benefits. The community infrastructure and existing roads could not support development on this scale with parking and congestion already being an issue in the villages.

**WOR 001: Wormit Farm (Housing)**

Stewart McKiddie (1886): Support proposal WOR 001 and the development of the farmhouse and steading. The proposal should be used to accommodate some housing for the elderly (including sheltered housing). Object to the proposed access road to proposal WOR 003.

**WOR 002: Wormit Sandpit**

Stewart McKiddie (1889): Support proposal WOR 002. The proposal should be used to accommodate some housing for the elderly (including sheltered housing).

**WOR 003: South of Wormit Farm**

Peter & Wendy Baylis (1201): Object to proposal WOR003. The proposed development is too large for Wormit given other housing allocations in the village. The proposal will obscure the key view of the Sidlaws and the River Tay as you drive along Kilmany Road.

Stewart McKiddie (1894): Object to proposal WOR003. This is productive Greenfield farmland and should not be considered for development.

Bill and Jeannie Nixon (2245): Object to Proposal WOR003. When considered alongside the other allocations in Wormit and Newport on Tay the scale of development proposed would increase the area by approximately 50%. The adverse impacts seem much
clearer than any possible benefits. The community infrastructure and existing roads could not support development on this scale with parking and congestion already being an issue in the villages.

**WOR 004: Wormit Farm (Rail Halt)**

Transport Scotland (3226): Agreement has not been reached with Transport Scotland on the inclusion of proposal WOR004 within the Proposed Plan as the results of an appropriate appraisal did not successfully conclude that a rail station was a viable transport solution. Therefore it is recommended proposal WOR 004 should be removed from the Proposed Plan.

**Sites (not in the Proposed FIFEplan) proposed by Objectors**

Linlathen Developments (Tayside) Limited (2132): Object to non-allocation of Candidate site LDP-WOR001 (Kilmany Road) (see supporting submission attached to representation) for mixed-use development. Wormit (with Newport-on-Tay and Tayport) are strategic towns with important links to Dundee. The sites at Kilmany Road could provide a mixed use development in an accessible location. There are no known infrastructure constraints. Land to the north east of the B946 is identified as a first phase (creating up to 200 houses), with an indicative framework identifying potential access to the site. The representation questions the timing of the delivery of strategic sites in the plan and the ability of the plan to meet housing delivery targets.

**TAYPORT**

**Tayport Issues**

David and Brenda Finlay (3178): The Proposed Plan fails to identify sufficient land to maintain a continuous five year land supply in accordance with Scottish Planning Policy and the Strategic Development Plan and relies on sites which although allocated have failed to deliver units over the past five years or more. More land should be allocated to provide a continuous five year land supply. The sites identified in Tayport for housing are not effective or have constraints that make them difficult to develop therefore Proposals TAY001, TAY002, TAY003, TAY004, TAY005 and TAY007 should be deleted.

**TAY 001: Links Road 2**

David and Brenda Finlay (3875): This site is owned by Fife Council who have shown no interest in developing the site. No planning permission exists for the site and the 2013 Housing Land Audit deems the site to be non-effective. The site should be deleted.

**TAY 002: Net Drying Green**

SEPA (3277): This proposal is located in or adjacent to the functional flood plain or an area of known flood risk. As such, part of the site may not be suitable for development. A Flood Risk Assessment (FRA) should be included as a site specific development requirement (as in the previous version of the plan), it is unclear why this requirement has been removed.

David and Brenda Finlay (3876): It is noted that a Flood Risk Assessment will be
required for this site; there is other land available which should be allocated before one which is potentially subject to flood risk. There should be a moratorium on developing sites which have been identified as being at risk of flooding until the outcome of the Coastal Flood Study are available. This site should be deleted.

### TAY 003: North of Spears Hill Road

David and Brenda Finlay (3877): The site is owned by Dundee City Council not David and Brenda Finlay (as identified in the 2013 Housing Land Audit), and they would need to purchase additional land to gain access to the site. Given the access issues the site should be deleted. The woodland planting on the site would need to be retained to protect the amenity of the area.

### TAY 004: Nelson Road

SEPA (3645): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site.

David and Brenda Finlay (3878): The 2013 Housing Land Audit identifies this site as non-effective as it has been included in the Local Plan since 2009 with no evidence of developer interest. All marketing of the site has failed and a Flood Risk Assessment is required. There is no evidence to support the ongoing allocation of this site.

### TAY 005: Scotscraig Works

SEPA (3279): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site.

Potential contamination issues have been identified for the site within the Environmental Report (ER) and mitigation measures have been included that a site specific risk assessment will be required as part of any application. This requirement is not however included within the site requirements in the plan. A requirement for a site specific risk assessment should be included in the development requirements, to make clear what information will be required at the planning application stage.

David and Brenda Finlay (3879): This site requires a Flood Risk Assessment. Applying the precautionary principle, it is submitted that other land should be allocated ahead of this site.

### TAY 006: Shanwell Road

SEPA (3280): The site is shown to be at risk of flooding on the therefore a Flood Risk Assessment is required. Any culverted watercourses in or adjacent to the site are also required to be assessed.

Potential contamination issues have been identified for the site within the Environmental Report (ER) and mitigation measures have been included that a site specific risk assessment will be required as part of any application. This requirement is not however included within the site requirements in the plan. A requirement for a site specific risk assessment should be included in the development requirements, to make clear what information will be required at the planning application stage.
### TAY 007: Abertay Works

SEPA (3646): Support the requirement for a Flood Risk Assessment to be undertaken prior to development on the site.

David and Brenda Finlay (3880): The 2013 Housing Land Audit identifies this site as non-effective due to major contamination and flooding issues. The site has been in the Local Plan since 2003 without coming forward for development. The site should be deleted as it is non-effective.

### Sites (not in the Proposed FIFE plan) proposed by Objectors

#### Candidate Site LDP-TAY001 (land at Spears Hill)

David and Brenda Finlay (3178): Seek allocation of Candidate Site LDP-TAY001 (land at Spears Hill) for residential development (including affordable housing and a potential care home), to help meet the shortage in affordable housing in Tayport, provide an opportunity for care home provision and contribute towards the housing land requirement. The site has been identified as suitable for development at the previous Local Plan Examination and Fife Council Officers have assessed it as appropriate for development (there is some challenge to the scoring of the assessments). Fife Council’s own Housing Service has expressed a desire to bring forward affordable housing on the site at the earliest opportunity. The site is close to local facilities and good pedestrian links can be achieved. There is capacity in the local school and an acute need for new social housing in the area. Supporting documents including a preliminary development framework have been provided which shows how constraints and opportunities have been considered (see Supporting Statement attached to representation). The site is well served by infrastructure, allows sympathetic integration into the settlement, and offers provision of new facilities for the community e.g. allotments and a shop.

#### Candidate Site LDP-LWD008 (Former Ministry of Defence Meteorological Testing Station)

David and Brenda Finlay (3182): Seek allocation of Candidate Site LDP-LWD008 (Former Ministry of Defence Meteorological Testing Station) (see Supporting Statement attached to representation) for leisure/recreation/holiday accommodation use. Proposals to redevelop this brownfield site, including the redundant buildings, would be to the benefit of the surrounding area providing an opportunity to enhance the recreational use of the beach and wider Green Network, including the adjacent Tentsmuir Forest as part of wider proposals to enhance recreational uses in the area.

The site is within approximately 400 metres of existing bus facilities and the access track could be upgraded. The proposed uses are consistent with LDP policies for development in the countryside. The site is close to various natural heritage designated sites but an examination into the St Andrews and East Fife Local Plan concluded that this proximity did not restrict the ability of the site to accommodate development. The site has been identified as at risk from coastal flooding, but the site is not liable to flooding and the LDP allocates sites elsewhere in Tayport with a similar risk. The Council needs to be consistent in its approach to such sites.
## COUNTRYSIDE AREA

**LWD017:** South East of the Tay Bridge Roundabout at the A92/B946 Junction

**TACTRAN (2729):** Tactran supports the proposal for provision of a park-and-choose facility.

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<th>Modifications sought by those submitting representations:</th>
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### BALMULLO

#### Balmullo Issues

HW Melville & Sons (675), A & J Stephen Ltd (2143): Re-examine the housing land supply strategy and allocate more housing sites outwith the Strategic Development Areas, including in Balmullo.

**BLO 001:** Balmullo Farm

SEPA (3308): none stated.

**BLO 002:** Land at Burnbrae Nursery, Clay Road

Mr & Mrs A Taylor (1264), A & J Stephen Ltd (2143), SEPA (3309): none stated.

Ann Gibson (32), Steven Martin (2174): Delete proposal BLO002 from FIFEplan.

#### Sites (not in the Proposed FIFEplan) proposed by Objectors

**Candidate Site LDP-BLO001**

HW Melville & Sons (675): Allocate candidate site LDP BL0001 at the south of Balmullo for housing.

**Candidate Site LDP-BLO003**

A & J Stephen Ltd (2143): Allocate candidate site LDP BL0003 (Lismore) for housing.

**Candidate Site LDP-BLO004**

A & J Stephen Ltd (2143): Allocate candidate site BL0004 (Land at Main Street) for housing.

#### Other Sites

Linnlathen Developments (Tayside) Ltd (2134): Seek the allocation of land at 3 sites south of Balmullo for residential development.
**PROPOSED FIFE LOCAL DEVELOPMENT PLAN**

**DRUMOIG**

**DRG 001: Drumoig**

Parkhill Construction Services Ltd and Drumoig Developments Ltd (3283), SEPA (3350): none stated.

Drumoig Residents Association (1313): No definitive view on modifications is stated.

**GAULDRY**

**GAU 001: Priory Road North**

A & J Stephen Ltd (2138): Extend Proposal GAU 001 (Priory Road North) to include the land immediately to the north of the site and increase the capacity to 40 units.

The Woodland Trust Scotland (2890): Delete proposal GAU 001 from the plan or identify a 10m buffer between the proposed development and the area of ancient woodland in the development requirements.

**Sites (not in the Proposed FIFEplan) proposed by objectors**

Kilmany Scottish Produce Ltd and D King Properties (Scotland) Ltd (2161): Allocate part of candidate site LDP-GAU002 Balgove Road for a residential development with a capacity of 40 units.

**GUARDBRIDGE**

**Guardbridge Issues**

Kingdom Housing Association (1179): Identify land at Toll Road which has planning permission for 66 affordable houses as a housing site.

NHS Fife (3847): none stated.

**GUA 002: Motray Park**

McHale Enterprises Ltd (1588): Add a reference to the existing planning consent granted in the development requirements. Delete the first green network priorities bullet point and remove the text ‘to establish a short round route’ from the green network priorities second bullet point.

SEPA (3458): none stated.

**GUA 003: Seggie Farm**

Seggie Farm (1070): none stated.

The Woodland Trust Scotland (2896): Delete proposal GUA 003 from the plan or identify a 10m buffer between the proposed development and the area of ancient woodland in the development requirements.
GUA 004: Site of Former Curtis Fine Papers

University of St Andrews (2217): Delete the requirements for a development framework and the one hectare (net developable area) of serviced employment land from proposal GUA 004.

SEPA (3459): none stated.

GUA 006: Avalon Business Park

SEPA (3460): none stated.

LEUCHARS

Leuchars issues

Athole Stewart (1653): none stated.

LEU 001: The Castle Field/Doocot Field

Athole Stewart (1381, 1474): Delete Proposal LEU 001. If the proposal is to remain it should be amended to include candidate site LDP-LEU002 (a) and to remove the land that is currently allocated as St Andrews and East Fife Local Plan proposal LEU01. There should be a requirement for an alternative access to the proposed greenspace to be provided from Fern Place.

Carroll Finnie (1373): Delete Proposal LEU 001.

Leuchars Community Council (2343): Amend the boundary of LEU 001 such that it only includes candidate sites LDP-LEU002 (a & b).

NEWPORT ON TAY AND WORMIT

Newport on Tay Issues

James Rough (614), Bill and Jeannie Nixon (2251): no definitive amendments stated.

NEW 001: Erich Road

James Rough (615): Delete proposal NEW 001. If the proposal is not to be deleted the capacity should be reduced. Requirements should be added for enhancement of the right of way to the west of the site and further guidance provided on the nature and location of the proposed landscaped and development edges.

Stewart McKiddie (1909): Delete proposal NEW 001. If the proposal is not deleted add the following text to the development requirements: ‘To be developed only once a substantive start to construction has been made at both sites WOR 001, Wormit Farm (Housing) and Wor 002, Wormit Sandpit.’ And reference as WOR rather than NEW.

Bill and Jeannie Nixon (2249): Delete proposal NEW 001.

SEPA (3581): none stated.
NEW 002: South of Victoria Park

Dr E O'Riordan (92): no definitive amendment stated.

SEPA (3582): none stated.

NEW 003: North West of Forgan Roundabout

Dr E O'Riordan (93): no definitive amendment to FIFEplan is stated.

Stewart McKiddie (1922): Extend the proposed walking/cycle route towards the old Forgan smithy and cemetery.

SEPA (3583): none stated.

Wormit Issues

James Rough (612): Reduce the scale of development proposed in Wormit.

Bill and Jeannie Nixon (2242): No definitive amendment to FIFEplan is stated.

WOR 001: Wormit Farm (Housing)

Stewart McKiddie (1886): Remove reference to the proposed access road to proposal WOR 003.

WOR 002: Wormit Sandpit

Stewart McKiddie (1889): Amend proposal to accommodate some housing for the elderly (including sheltered housing).

WOR 003: South of Wormit Farm

Peter & Wendy Baylis (1201), Stewart McKiddie (1894), Bill and Jeannie Nixon (2245): Delete proposal WOR003.

WOR 004: Wormit Farm (Rail Halt)

Transport Scotland (3226): Delete proposal WOR 004.

Sites (not in the Proposed FIFEplan) proposed by Objectors

Linlathen Developments (Tayside) Limited (2132): Allocate Candidate site LDP-WOR001 (Kilmany Road) for mixed-use development, including up to 200 houses.

TAYPORT

Tayport Issues

David and Brenda Finlay (3178): Allocate more land for housing and delete “ineffective” FIFEplan Proposals TAY001, TAY002, TAY003, TAY004, TAY005 and TAY007.
TAY 001: Links Road 2
David and Brenda Finlay (3875): Delete Proposal TAY 001.

TAY 002: Net Drying Green
SEPA (3277): Include a requirement for a Flood Risk Assessment in the development requirements text.
David and Brenda Finlay (3876): Delete Proposal TAY 002.

TAY 003: North of Spears Hill Road
David and Brenda Finlay (3877): Delete Proposal TAY 003.

TAY 004: Nelson Road
SEPA (3645): none stated.
David and Brenda Finlay (3878): Delete Proposal TAY 004.

TAY 005: Scotsraig Works
SEPA (3279): Include a requirement for a site specific risk assessment in the development requirements text.
David and Brenda Finlay (3879): Delete Proposal TAY 005.

TAY 006: Shanwell Road
SEPA (3280): Include requirements for a site specific risk assessment and a Flood Risk Assessment in the development requirements text.

TAY 007: Abertay Works
SEPA (3646): none stated.
David and Brenda Finlay (3880): Delete Proposal TAY 007.

TAY 009: Links Road
SEPA (3648): none stated.

Sites (not in the Proposed FIFEplan) proposed by Objectors

Candidate Site LDP-TAY001 (land at Spears Hill)
David and Brenda Finlay (3178): Allocate candidate site LDP-TAY001 (Land at Spears Hill) for residential and care home development.
Candidate Site LDP-LWD008 (Former Ministry of Defence Meteorological Testing Station)

David and Brenda Finlay (3182): Allocate candidate site LDP-LWD008 (Former Ministry of Defence Meteorological Testing Station) for leisure/recreation/holiday accommodation use.

COUNTRYSIDE AREA

LWD017: South East of the Tay Bridge Roundabout at the A92/B946 Junction

TACTRAN (2729): none stated.

Summary of responses (including reasons) by planning authority:

BALMULLO

Balmullo Issues

HW Melville & Sons (675), A & J Stephen Ltd (2143): Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with in Issue 2B Homes.

The scale of growth set out for Balmullo in the Proposed Local Development Plan is considered to be consistent with the strategy of the plan. Proposals BLO001 and BLO002 allow for an organic level of growth for the village.

BLO 001: Balmullo Farm

SEPA (3308): Support for FIFEplan position is noted.

BLO 002: Land at Burnbrae Nursery, Clay Road

Mr & Mrs A Taylor (1264) and the Scottish Environment Protection Agency (3309): Support for the FIFEplan position is noted.

Ann Gibson (32), Steven Martin (2174), A & J Stephen Ltd (2143): Comments noted. Site BLO 002 'Land at Burnbrae Nursery, Clay Road' is included in the Proposed Local Development Plan for 20 houses. Development of this site, which represents smaller scale development of a brownfield site, is consistent with the spatial strategy. Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision. Fife Council Transportation officers consider that the impacts on traffic and road safety are acceptable. Consideration could be given to extending 30mph speed limit zone to include access to site. Detailed matters, such as the specifications of road access will be dealt with at planning application stage.
Sites (not in the Proposed FIFEplan) proposed by Objectors

Candidate Sites LDP-BLO001, LDP-BLO003, LDP-BLO004, and Other Sites

HW Melville & Sons (675), A & J Stephen Ltd (2143), Linlathen Developments (Tayside) Ltd (2134): It remains Fife Council’s position that these sites should not be allocated for development at this time. The Proposed Local Development Plan allocates land for housing across the St Andrews and North East Fife Housing Market Area, sufficient to meet statutory requirements. The strategy of FIFEplan does not identify Balmullo as an area of growth and it is therefore considered that development should be more local scale development to meet local needs. The proposed new site BLO002 is considered to provide sufficient growth to meet these needs.

Whilst acknowledged that development of candidate site LDP-BLO001 could be phased to allow smaller scale growth within the short term there are no natural boundaries to achieve this. The site is considered to be likely to have a greater visual impact than the sites identified in the Proposed Plan. Vehicular access to candidate site LDP-BL0003 is considered to be unsatisfactory on the basis that it would not comply with Designing Streets. The other sites put forward by Linlathen Developments are of a scale both individually and cumulatively that would not be supported by the plan strategy and, whilst all sites identified for housing development in the Proposed Local Development Plan have been the subject of site assessments, these other sites have not.

DRUMOIG

DRG 001: Drumoig

Parkhill Construction Services Ltd and Drumoig Developments Ltd (3283), SEPA (3350): Support for the FIFEplan position is noted.

Drumoig Residents Association (1313): This proposal carries forward an existing Local Plan allocation (proposal DRG 01 of the Adopted St Andrews & East Fife Local Plan). A planning application for mixed use leisure and residential development (ref. 14/03572/PPP) is currently being considered by Fife Council.

There has been a programme of engagement between the site promoter and the local community around the development proposals, and this has resulted in a degree of support for the principle of the development within the community, although this is not unanimous and there remain concerns around some proposed uses from some in the community. The comments from Drumoig Residents Association highlight that there are a range of views from the residents of Drumoig to the proposals.

The decision to retain the existing Local Plan position on the site in the Proposed Local Development Plan was made, mindful of the engagement process surrounding the planning application, and the fact that the issue is likely to be resolved through the Development Management process before FIFEplan is concluded, and therefore in order not to pre-judge the planning application.

Parkhill Construction Services Ltd and Drumoig Developments Ltd support the proposals in the Proposed Local Development Plan for this site.
The proposal as carried forward allows for an appropriate scale of development and requires the preparation of an Indicative Development Framework featuring high quality design. Development must include the provision of community facilities and well-integrated greenspace. Developer requirements and Local Development Plan policies will protect natural and built heritage assets.

GAULDRY

GAU 001: Priory Road North

A & J Stephen Ltd (2138): The Proposed Local Development Plan allocates land for housing across the St Andrews and North East Fife Housing Market Area, sufficient to meet statutory requirements. The strategy of FIFEplan does not identify Gauldry as an area of growth and it is therefore considered that development should be more local scale development to meet local needs. The existing allocation for 20 houses is considered sufficient growth to meet these needs. The additional land sought through the candidate site is considered inappropriate due to the likely adverse landscape impact. The additional land proposed was considered at the examination of the St Andrews & East Fife Local Plan. The Examination Reporter took the view that screen planting would be unlikely to provide mitigation (see paragraph 13, p235-236, CD22). An adverse landscape impact was also highlighted through the site assessment process.

The Woodland Trust Scotland (2890): The Woodland Trust Scotland highlight that the site is adjacent to an area of ancient woodland, and object to development unless the protection of the adjacent woodland can be guaranteed through a 10m buffer between the proposed development and woodland. Taking this into account, Fife Council considers that there may be merit in amending the developer requirements for the site to ensure that no development should be within 10m of the adjoining woodland area, and invites the Reporter to make an appropriate recommendation on this issue. Such an approach would be consistent with developer requirements identified for other sites in the plan. Appropriate survey work will require to be carried out as part of any planning application for the site.

Sites (not in the Proposed FIFEplan) proposed by objectors

Kilmany Scottish Produce Ltd and D King Properties (Scotland) Ltd (2161): It remains Fife Council’s position that no part of candidate site LDP-GAU002 should be allocated for development at this time. The Proposed Local Development Plan allocates land for housing across the St Andrews and North East Fife Housing Market Area, sufficient to meet statutory requirements. The strategy of FIFEplan does not identify Gauldry as an area of growth and it is therefore considered that development should be more local scale development to meet local needs. Whilst the scale of development is now more in keeping with the strategy of the plan, the existing allocation at Priory Road North for 20 houses is considered sufficient growth to meet the needs of Gauldry. The larger candidate site was considered at the examination of the St Andrews & East Fife Local Plan. The Reporter noted that access to the site from Balgove Road would provide a contrived access which would not assist in the integration of any development into the village structure (see paragraph 18, 236, CD22).
Guardbridge Issues

Kingdom Housing Association (1179): Kingdom Housing Association consider that FIFEplan should acknowledge the planning approvals 14/01288/FULL and 13/01004/FULL for 66 affordable houses at Toll Road, Guardbridge. Fife Council proposes a factual amendment to the plan, in order to reflect these recent planning approvals.

NHS Fife (3847): Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision.

GUA 002: Motray Park

McHale Enterprises Ltd (1588): McHale Enterprises Ltd request that the planning permission granted for this site in October 2014 (13/02959/PPP) should be referred to, and object to the first bullet in the green network priorities to establish an access route along the disused railway line and the text ‘to establish a short round route’ in the second bullet in the green network priorities. Taking this into account, Fife Council considers that there may be merit in amending the developer requirements to recognise the recent approval of this site. It is also acknowledged that the disused railway line is in different ownership to the development site and that it may therefore be unreasonable to maintain the developer requirements set out in the Proposed Local Development Plan on this matter. Nevertheless Fife Council considers that a requirement for the development to allow a link to the disused railway line and potential future footpath connections along this route should remain in the plan in the event that the current permission is not implemented. Fife Council invites the Reporter to make an appropriate recommendation on this issue.

SEPA (3458): Support for the FIFEplan position is noted.

GUA 003: Seggie Farm

Seggie Farm (1070): Support for the FIFEplan position is noted.

The Woodland Trust Scotland (2896): The Woodland Trust Scotland highlight that the site is adjacent to an area of ancient woodland, and object to development unless the protection of the adjacent woodland can be guaranteed through a 10m buffer between the proposed development and woodland. The developer requirements in the Proposed Local Development Plan set out that no development should be within 10m of the woodland. Whilst some loss of woodland may be required to provide access. appropriate survey work will need to be carried out as part of any planning application for the site.

GUA 004: Site of Former Curtis Fine Papers

University of St Andrews (2217): This site was previously allocated in the adopted St Andrews and East Fife Local Plan as an Area of Mixed Use (site ref. GUA 05),
highlighting the site has a development opportunity following the close of the Paper Mill. Since then the University of St Andrews have purchased the site. Two approved planning applications set the basis for the future development of the site. 14/02334/EIA proposes a Renewable Energy Centre (biomass power plant and fuel storage) on land adjacent to the estuary. 14/01933/PPP applies to the wider paper mill site and proposes mainly employment focussed uses (industrial, storage, distribution, office, research and development).

The developer requirements for a development framework and a minimum of one hectare of serviced employment land have been considered through the approved planning application on this site (14/01933/PPP – approved subsequent to the finalisation of the Proposed Local Development Plan).

In relation to the requirement to provide a development framework, the approved planning permission in principle includes a general framework for the development of the site. It is considered that the requirement in the plan to provide a development framework is appropriate, as a major site at the heart of Guardbridge, to allow for the possibility that the current intentions for the site outlined within the planning permission in principle application could be changed at a later date.

In relation to employment land provision, it is acknowledged that the provision of serviced plots is likely to be impractical given the site restrictions, but there is potential to provide suitable floorspace within the existing buildings complex. Fife Council planning officers consider that the approved planning permission in principle application sets out a strategy for improvements to the attractiveness of the site for a range of employment and university uses covering in excess of 1ha, and therefore can comply with this aspect of the policy once the potential for the site is realised at a detailed stage. Fife Council invites the Reporter to consider whether an amendment to the wording of this requirement may be appropriate, to reflect the flexibility that Fife Council has applied in relation to the approved planning application.

SEPA (3459): Support for the FIFEplan position is noted.

GUA 006: Avalon Business Park

SEPA (3460): Support for the FIFEplan position is noted

LEUCHARS

Leuchars issues

Athole Stewart (1653): Comments submitted through the consultation note that the protected open space identified along Main Street near the Commercial Arms has been granted planning permission (11/02818/FULL) and raise concern that this may impair the off road cycle route proposed within Proposal LEU 001 and the connection to the core path.

The permitted application is conditioned to ensure that development will retain the Core Path through the site. It is considered that, alongside Proposal LEU 001, this area of land will allow for an alternative cycle route away from Main Street, which is a busy vehicular route.
The Council considers that, in order to reflect the planning permission 11/02818/FULL, there may be merit in removing the Protected Open Space designation on the land which has been approved for residential use in the Local Development Plan, and invites the Reporter to make an appropriate recommendation on this issue.

LEU 001: The Castle Field/Doocot Field

Athole Stewart (1381, 1474), Carroll Finnie (1373). Leuchars Community Council (2343): Site LEU 001 ‘The Castle Field/Doocot Field’ is included in the Proposed Local Development Plan for 200 houses. The site forms an extension to an existing allocated site (St Andrews & East Fife Local Plan Proposal LEU 01 – see CD9) which has had to be reduced in scale due to potential on-site flooding concerns. The combined site could contribute 200 homes to meeting the TAYplan housing land requirement. Leuchars/Guardbridge is identified as a Tier 3 settlement by the TAYplan Strategic Development Plan.

An area of land that had been promoted through the candidate site (ref: LEU 002a) to the north of the access track to Leuchars Castle has been excluded due to the likely negative impact on the landscape and built heritage (scheduled area of the monument Leuchars Castle).

The Proposed Local Development Plan sets out the following requirements to protect the site and setting of the Doocot and the Leuchars Castle/Motte Ancient Scheduled Monument:

‘Sensitive design and landscaping is required, recognising the prominence of the site as approached from the north. The layout and design must protect the site and setting of Leuchars Castle Doocot, which is a category A Listed Building, and Leuchars Castle, motte and associated remains Scheduled Ancient Monument. Development will ensure the repair and conservation of the doocot at the earliest opportunity.’

The proposed housing allocation LEU 001 shows a green circle of protected open space around the Doocot reflecting the 50m buffer agreed as part of a planning application conditionally approved on this site for 140 houses.

The Proposed Plan also states the need to ‘provide additional public greenspace which will also protect the setting of built heritage assets and incorporate land at risk of flooding’. The Indicative Proposed Green Network mapping (which includes land around the Doocot and Scheduled Ancient Monument) highlights indicatively a large part of the site that should remain free from built development.

Historic Scotland have been consulted on this site and the proposals set out in the Proposed Local Development Plan incorporate the comments they have provided.

The Doocot is recognised as a potential roost site for bats or barn owls. With appropriate mitigation including a buffer zone from the Doocot it is considered that there will be no significant negative impact on natural heritage. It is likely that a large area of the eastern part of the site will be greenspace, some of which is identified by Indicative Proposed Green Network mapping.

Council Services such as Transportation and Education, along with external partners
and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision. Detailed matters, such as the specifications of road and pedestrian access will be dealt with at planning application stage.

NEWPORT ON TAY AND WORMIT

Newport on Tay Issues

James Rough (614), Bill and Jeannie Nixon (2251): Housing Need and Demand Assessments do not provide details of housing demand for individual settlements. The proposals for Newport on Tay and Wormit have been informed by the housing requirement set out in the adopted TAYplan Strategic Development Plan (2012) for the St Andrews and North East Fife Housing Market Area, and take into consideration that Newport on Tay and Wormit form part of TAYplan’s Dundee Core Area principal settlement.

A significant level of housing land (with identified capacity for 362 houses) has been carried forward from the adopted St Andrews and East Fife Local Plan (2012) within the settlement, and on that basis, it is considered that no additional housing allocations are required in Newport on Tay and Wormit at this time.

Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision. Fife Council's Green Infrastructure Supplementary Planning Guidance (2014) provides guidance on how new development should assess the need for and incorporate green infrastructure (including recreation and play facilities) into new development. The cumulative impacts of all sites within Newport on Tay and Wormit have been considered.

NEW 001: Ericht Road

James Rough (615), Stewart McKiddie (1909), Bill and Jeannie Nixon (2249): Proposal NEW001 'Ericht Road' has been carried forward from the adopted St Andrews & East Fife Local Plan (2012). In the Proposed Local Development Plan, land previously identified as coming forward after 2018 has been incorporated into a single site proposal.

Where possible, when identifying locations for new housing and other uses, Fife Council considers the re-use of previously developed land before development on greenfield sites, in line with Scottish Planning Policy (paragraph 40). In order to conform to TAYplan Strategic Development Plan requirements, however, it has been necessary to include greenfield development sites in the Local Development Plan.

It is considered that it would not be appropriate to place a restriction on site NEW 001, that no development should take place until a substantive start has been made at
brownfield sites WOR001 ‘Wormit Farm’ and WOR002 ‘Wormit Sandpit’, as delays in bringing forward these sites may impede Fife Council’s ability to maintain an effective housing supply.

Such a restriction is considered appropriate for WOR003 where the sites are in the same ownership, in close proximity, and where it makes less sense in terms of the natural growth of the settlement to allow development South of Wormit Farm until development to the north has begun.

Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision. The cumulative impacts of all sites within Newport on Tay and Wormit have been considered. Details such as impact of development on the sunlight affecting other properties would be considered at the planning application stage.

The estimated capacity of site NEW001 ‘Ericht Road’ identified in the Proposed Local Development Plan (100 houses) is considered appropriate for a site of this size (5.5Ha) taking into account the topography of the site. Further consideration of what is an appropriate density of development will be required at the planning application stage.

The developer requirements for the site include the need to retain and upgrade the existing core path on the western boundary of the site, and to deliver a high quality landscape edge along the southern boundary of the site to provide an appropriate landscaped setting and connections to adjacent woodland habitat. These requirements are considered an appropriate basis for the consideration of planning applications, albeit that more detailed assessment will be required at that stage. In this context therefore, Fife Council considers that there may be merit in amending the Green Network Priorities for this site to acknowledge and protect the nature trails and wildlife corridors indicated by Bill and Jeannie Nixon, and invites the Reporter to make an appropriate recommendation on this issue.

Fife Council’s Green Infrastructure Supplementary Planning Guidance (2014) provides guidance on how new development should assess the need for and incorporate green infrastructure (including recreation and play facilities) into new development.

Scottish Environment Protection Agency (3581): Support for FIFEplan position is noted.

NEW 002: South of Victoria Park

Dr E O'Riordan (92): Proposal NEW 002 ‘South of Victoria Park’ has been carried forward from the adopted St Andrews & East Fife Local Plan (2012). Council Services such as Transportation have been consulted throughout the development planning process. Detailed matters, such as the specifications of road access will be dealt with at planning application stage; however, it is considered that there should not be a direct access on to the A92 from this site. This position is reflected in the developer requirements.

Scottish Environment Protection Agency (3582): Support for the FIFEplan position is
NEW 003: North West of Forgan Roundabout

Dr E O'Riordan (93), Stewart McKiddie (1922): Proposal NEW003 ‘North West of Forgan Roundabout’ has been carried forward from the adopted St Andrews & East Fife Local Plan (2012). Council Services such as Transportation have been consulted throughout the development planning process. It is considered appropriate that direct access onto the A92 should be avoided as far as is practicable. The developer requirements state that access should be from the local road network for non-roadside service uses, and that transport appraisal will be required to determine and agree access arrangements. It is acknowledged that low-lying parts of the site are prone to flooding, however, there is sufficient land remaining on site to provide for the development uses set out in the plan.

 Provision of a walking/cycling route along the B995 adjacent to the site is considered appropriate to encourage walking/cycling, both to the centre of Newport on Tay and to the Forgan roundabout. There may be long-term potential for a cycle route from the Tay Bridgehead to Leuchars and beyond utilising this route.

 SEPA (3583): Support for the FIFEplan position is noted.

Wormit Issues

James Rough (612), Bill and Jeannie Nixon (2242): The sites in Wormit and Newport have been carried forward from the adopted St Andrews & East Fife Local Plan (2012). The sites were considered through the examination of the adopted Local Plan. This considered issues relating to scale of development, and impact on local infrastructure and roads (see paragraphs 8-10, p346, CD22). The reporter found that:

- the various land use allocations identified in the local plan provide a reasonable overall solution to the housing land requirement;
- the physical character of Newport and Wormit would not suffer significant adverse impact as a result of the proposed development; and
- it has not been demonstrated that the potential impact on infrastructure is such to justify restriction of development proposed in the Newport on Tay and Wormit Settlement Plan.

 Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision. The cumulative impacts of all sites within Newport on Tay and Wormit have been considered.

 WOR 001: Wormit Farm (Housing)

Stewart McKiddie (1886): Support for the FIFEplan position is noted. In view of the general housing need in the area, it is considered that it would be inappropriate to limit housing proposed on this site to elderly or sheltered housing. However, were such a proposal to come forward, it would be likely to be considered favourably in principle. The Green Network Priorities contain reference to an access route through the site, which
connects into proposed developments south of the site. As a Green Network Priority, this statement refers to providing an active travel route e.g. pedestrian or cycle links. However, it could be combined with a road link. Both vehicular and active travel links between sites WOR001, WOR003 and WOR004 are likely to be supported to reflect Designing Streets guidance.

WOR 002: Wormit Sandpit

Stewart McKiddie (1889): Support noted. In view of the general housing need in the area, it is considered that it would be inappropriate to limit housing proposed on this site to elderly or sheltered housing. However, were such a proposal to come forward, it would be likely to be considered favourably in principle.

WOR 003: South of Wormit Farm

Peter & Wendy Baylis (1201), Stewart McKiddie (1894), Bill and Jeannie Nixon (2245): Proposal WOR003 ‘South of Wormit Farm’ has been carried forward from the adopted St Andrews & East Fife Local Plan (2012). In the Proposed Local Development Plan, land previously identified as coming forward after 2018 has been incorporated into a single site proposal.

Where possible, when identifying locations for new housing and other uses, Fife Council considers the re-use of previously developed land before development on greenfield sites, in line with Scottish Planning Policy (paragraph 40). In order to conform to TAYplan Strategic Development Plan requirements, however, it has been necessary to include greenfield development sites in the Local Development Plan.

Council Services such as Transportation and Education, along with external partners and organisations such as NHS Fife and Scottish Water, have been consulted throughout the development planning process. Where potential deficiencies have been identified, in some cases enhanced or upgraded provision has already been planned for as a result of Local Development Plan allocations while, in others, there will be "on-demand" provision or upgrades to existing provision. The cumulative impacts of all sites within Newport on Tay and Wormit have been considered.

The issue of views to the River Tay and beyond was considered through the examination of the adopted Local Plan (see paragraphs 8-10, p346, CD22). The reporter found that:

"Whilst the development of the land would undoubtedly alter the outlook to the Tay from nearby properties and the B946, I do not consider that the impact on amenity would be such as to justify deleting the housing allocation. I consider a carefully designed development could be integrated into Wormit without detriment to the character of the village or to the wider landscape setting."

WOR 004: Wormit Farm (Rail Halt)

Transport Scotland (3226): The wording within the Local Development Plan reflects comments made by Transport Scotland. The policy confirms that this site is included within the SEStrans Regional Transport Strategy Delivery Plan 2008-23 but that the proposal is not currently supported by the Strategic Transport Projects Review and Transport Scotland who have no commitment towards funding the delivery of a station at
this location. Transport Scotland’s policy is to promote better utilisation of the existing
network as a first choice and, as such, welcomes proposals for Park-and-Choose sites
which complement established rail facilities.

Demand for new station may come about as a result of future proposed development at
sites WOR001, WOR002 and WOR003. In that event, the case for a new station will be
considered where the needs of the local communities, workers or visitors would be
sufficient to generate a high level of demand, and it is more likely that feeder rather than
inter-urban services would serve the station.

Sites (not in the Proposed FIFEplan) proposed by Objectors

Linlathen Developments (Tayside) Limited (2132): Linlathen Development (Tayside)
Limited object to the non-allocation of candidate site LDP-WOR001 ‘Kilmany Road’. It
remains Fife Council’s position that candidate site LDP-WOR001 should not be allocated
for development at this time, due to the scale of development, poor potential for
integration with the settlement of Wormit, and due to the adverse landscape impact.

The Proposed Local Development Plan allocates land for housing across the St
Andrews and North East Fife Housing Market Area, sufficient to meet statutory
requirements. Existing allocations within Newport on Tay and Wormit are considered
sufficient growth to meet the needs of the area.

The site was considered at the examination of the St Andrews & East Fife Local Plan
(see paragraph 17, p382, CD22). The Reporter highlighted concerns that ‘that the scale
of development is such that it would have the potential to impact on the existing physical
and social structure of Wormit, including infrastructure provision, the setting of the village
and the landscape character of the vicinity.

TAYPORT

Tayport Issues

David and Brenda Finlay (3178): Issues relating to the housing land requirement and the
provision of an effective housing land supply are dealt with in Issue 2B Homes. Issues
relating to the specific proposals in the plan for Tayport are addressed below.

TAY 001: Links Road 2

David and Brenda Finlay (3875): Proposal TAY 001 ‘Links Road 2’ has been carried
forward from the adopted St Andrews & East Fife Local Plan (2012). It is identified as a
Housing Opportunity Site and has therefore not been counted towards meeting the
housing land requirement. Nevertheless, as a small infill site within the settlement
boundary, it is considered appropriate to highlight it as an opportunity for development in
the plan.

TAY 002: Net Drying Green

SEPA (3277): SEPA has identified that a developer requirement in the adopted St
Andrews & East Fife Local Plan for a Flood Risk Assessment is missing from the
Proposed Local Development Plan. It is confirmed that this omission is an error. Taking
this into account, Fife Council considers that there is merit in amending the developer
requirements to re-introduce the requirement for a Flood Risk Assessment on this site. Fife Council invites the Reporter to make an appropriate recommendation on this issue.

David and Brenda Finlay (3876): Proposal TAY 002 ‘Net Drying Green’ has been carried forward from the adopted St Andrews & East Fife Local Plan (2012). As a brownfield, small infill site within the settlement boundary, it is considered appropriate to allocate it for development in the plan. To reflect that there is no developer interest actively pursuing the development of this site, Fife Council considers that there may be merit in identifying this site as a ‘Housing Opportunity’ site rather than a ‘Housing’ site. Fife Council invites the Reporter to make an appropriate recommendation on this issue.

TAY 003: North of Spears Hill Road

David and Brenda Finlay (3877): Proposal TAY 003 ‘North of Spears Hill Road’ has been carried forward from the adopted St Andrews & East Fife Local Plan (2012). As a small infill site within the settlement boundary, it is considered appropriate to allocate it for development in the plan. To reflect that there is no developer interest actively pursuing the development of this site; Fife Council considers that there may be merit in identifying this site as a ‘Housing Opportunity’ site rather than a ‘Housing’ site. Fife Council invites the Reporter to make an appropriate recommendation on this issue.

TAY 004: Nelson Road

SEPA (3645): Support for FIFEplan position is noted.

David and Brenda Finlay (3878): Proposal TAY 004 ‘Nelson Road’ has been carried forward from the adopted St Andrews & East Fife Local Plan (2012). It is identified as a Housing Opportunity Site and has therefore not been counted towards meeting the housing land requirement. As a small, brownfield, infill site within the settlement boundary, it is considered appropriate to highlight the site as an opportunity for development in the plan.

TAY 005: Scotscraig Works

SEPA (3279): SEPA note that potential contamination issues have been identified for the Site within the Environmental Report with mitigation measures highlighting that a site Specific Risk Assessment will be required as part of any application. SEPA suggest that this requirement should be included in the development requirements, to make clear what information will be required at the planning application stage. It is confirmed that this omission is an error. Taking this into account, Fife Council considers that there may be merit in amending the developer requirements to highlight the requirement for a Site Specific Risk Assessment on this site, and Fife Council invites the Reporter to make an appropriate recommendation on this issue.

David and Brenda Finlay (3879): Proposal TAY 005 ‘Scotscraig Works’ is identified as a Housing Opportunity Site and has therefore not been counted towards meeting the housing land requirement. As a brownfield site within the settlement boundary, it is considered appropriate to highlight the site as an opportunity for development in the plan. The developer requirements highlight the need for a Flood Risk Assessment.
TAY 006: Shanwell Road

SEPA (3280): SEPA has identified that a developer requirement for a Flood Risk Assessment is missing from the Proposed Local Development Plan, and that this should assess any culverted watercourses in or adjacent to the site. SEPA also notes that potential contamination issues have been identified for the Site within the Environmental Report with mitigation measures highlighting that a Site Specific Risk Assessment will be required as part of any application. SEPA suggests that this requirement should be included in the development requirements, to make clear what information will be required at the planning application stage.

It is confirmed that the lack of reference to a Flood Risk Assessment is a publication error, and it is agreed that it may be helpful to highlight the requirement for a Site Specific Risk Assessment. Taking this into account, Fife Council considers that there may be merit in amending the developer requirements to include requirements for a Flood Risk Assessment and a Site Specific Risk Assessment on this site, and Fife Council invites the Reporter to make an appropriate recommendation on this issue.

TAY 007: Abertay Works

SEPA (3646): Support for the FIFEplan position is noted.

David and Brenda Finlay (3880): Proposal TAY007 ‘Abertay Works’ has been carried forward from the adopted St Andrews & East Fife Local Plan (2012), albeit that the description has changed from ‘Area of Mixed Use’ to ‘Leisure/Community’ use to more appropriately reflect emerging proposals for the site.

Tayport Community Trust are working with Fife Council to identify and progress specific proposals for the Abertay Works site. The position set out in the Local Development Plan is that if proposals and funding cannot be agreed the site will be re-allocated for employment and residential uses.

Whilst an estimated housing capacity is included in the plan given the potential for housing, the site has not been counted towards meeting the housing land requirement. As a brownfield, infill site within the settlement boundary, it is considered appropriate to highlight the site as an opportunity for development in the plan.

Sites (not in the Proposed FIFEplan) proposed by Objectors

Candidate Site LDP-TAY001 (land at Spears Hill)

David and Brenda Finlay (3178): Whilst there are considered to be merits with this site with regard to integration with the existing settlement, and the settlement hierarchy provided by TAYplan; due to existing allocations across the Tay bridgehead area, this site is not considered to be required at this time.

Tayport is part of the Tier 1 Dundee Core Area in TAYplan. This reflects geographical proximity to Dundee and a high degree of linkages to the city. The identification of a Core Area for Dundee allows greater scope for consideration of cross-boundary issues. There is already a significant level of development planned for the Tay Bridgehead area. In view of the relatively high amount of brownfield land and proposals for the regeneration of Dundee’s town centre and waterfront, it is considered that additional
large-scale release of greenfield sites at the Tay bridgehead could be detrimental to regeneration proposals in Dundee. There are also a number of brownfield sites within Tayport itself.

The Proposed Local Development Plan allocates land for housing across the St Andrews and North East Fife Housing Market Area, sufficient to meet statutory requirements. At this time, there is no need to allocate this site for housing. Issues relating to the housing land requirement and the provision of an effective housing land supply are dealt with in Issue 2B Homes.

The Strategic Environmental Assessment is a means to judge the likely impacts of a public plan on the environment and to identify ways to minimise that effect, if it is significant. To assist in judging the impacts of the sites that have been put forward for consideration for the proposed local development plan, site assessments have been carried out for all candidate sites. As part of this process, a methodology that used a scoring mechanism has been used scoring likely impacts of proposals against Strategic Environmental Assessment themes. The resultant scores allow an overall assessment to be made of the likely significant environmental impacts of the plan.

Site scoring has been used as a means of assessing the overall strategic impact of the proposed Local Development Plan rather than a comparison of sites. The selection of sites within the Proposed Plan has taken account of a range of factors including environmental impacts highlighted through the Strategic Environmental Assessment. The site assessment for this site is considered to highlight all the relevant issues and takes into account information provided by the site promoter through the Local Development Plan process.

**Candidate Site LDP-LWD008 (Former Ministry of Defence Meteorological Testing Station)**

David and Brenda Finlay (3182): The Former MoD Meteorological Testing Station to the east of Tayport is a brownfield site with derelict buildings outside the settlement boundary. Parts of the site have a greenfield appearance. The site assessment process highlighted potential landscape, transportation, natural heritage and flood risk issues.

The site promoter has requested that the site be allocated for leisure / recreation / holiday accommodation use. No detailed site proposal has been submitted in support of the proposals.

Fife Council’s Shoreline Management Plan (2011) (see CD34, pages 162-163) highlights that there could be potential flooding in the immediate vicinity of the site as a result of future sea level rises and identifies the area as one of ‘no active intervention’. The candidate site itself is on slightly higher ground than the land surrounding it but there would be concerns in relation to flooding of the access track to the site.

Fife Council is in the process of preparing on a Tayport Coastal Flooding Study which may provide intervention proposals relevant to the consideration of any proposals for the future development of this site. The final report is anticipated in May/June 2015.

It is considered that there may be potential for sensitive development on this site, however, in the absence of firm proposals, this would be more appropriately considered outwith the development plan process. It is therefore recommended that the proposal is
not included in the Local Development Plan at this time.

COUNTRYSIDE AREA

LWD017: South East of the Tay Bridge Roundabout at the A92/B946 Junction

TACTRAN (2729): Support for the FIFEplan position is noted.

Reporter’s conclusions:

BALMULLO

Balmullo issues

1. Housing market areas, not individual settlements, are the geographical areas used to determine housing land requirements. Scottish Planning Policy explains that one of the roles of the planning system is to identify a generous supply of land for each housing market area to support the achievement of the housing land requirement. The overall adequacy of the supply across this part of the plan area is considered in detail at Issue 2(b).

2. Balmullo is within the St Andrews and North East Fife Housing Market Area. TAYplan sets out the average annual housing market build rate required across the housing market area to ensure an appropriate supply of housing land is provided. It focuses the majority of new development on the principal settlements in this part of the plan area. Balmullo is not identified as a principal settlement in TAYplan. I accept that TAYplan provides for some development in settlements that are not defined as principal settlements. However, there is no requirement to offer opportunities for housing developments, particularly large scale ones, in every settlement in a housing market area. The fact that Balmullo has been the subject of significant expansion in the past does not provide a sound justification for making further significant housing allocations in the village in the proposed plan.

3. TAYplan directs the largest number of new houses in the housing market area to the nearby strategic development area at St Andrews West. I am satisfied that the proposed plan also provides a range of opportunities in other locations across the housing market area. I therefore see no pressing strategic need to make any further housing allocations in the village. Additionally, I note that the proposed plan makes provision for the modest expansion of the village by allocating 2 sites for housing (43 houses in total). Representations question the deliverability of site BLO 001 (Balmullo Farm), and I accept that it appears constrained. However, I note that the proposed plan treats it as a housing opportunity site and that it is identified as non-effective in the 2015 Housing Land Audit. I consider this to be a reasonable approach. It is not been demonstrated that further housing allocations are required to support local services. If all the sites proposed in the representations, or even a large part of them, were allocated for housing, it would result in a very significant expansion of Balmullo, which would undermine the spatial strategy of both TAYplan and the proposed plan. In all the circumstances, I am satisfied that the proposed plan identifies a reasonable level of housing growth for the village.

4. I consider these matters, including site BLO 002 (Land at Burnbrae Nursery, Clay
BLO 002: Land at Burnbrae Nursery, Clay Road

5. BLO 002 is situated at the south eastern corner of Balmullo, on the southern side of Clay Road, which links Main Street (A914) to Toll Road. It extends to just over 1.5 hectares, and mainly comprises a former nursery. Its allocation for housing in the proposed plan is a change from its countryside designation in the adopted local plan. The estimated capacity of the site is 20 houses. The site contributes to meeting the housing land requirement, and its development would allow for a modest expansion of Balmullo, in line with the proposed plan’s settlement strategy.

6. The site is outwith the settlement boundary of Balmullo in the adopted local plan, but within it in the proposed plan. It is of a modest size, predominantly brownfield, reasonably well contained, and represents a natural and appropriate extension of the village.

7. The site is well located for local facilities. I believe that it would be likely that a satisfactory vehicular access could be achieved from Clay Road. While the road is narrow, I see no reason why it should not be able to reasonably accommodate the traffic generated by 20 houses. This is particularly so when account is taken of the fact that the site would probably have generated a reasonable level of traffic when previously used as a nursery. I also note that the roads authority has not objected to the allocation. The development requirements in the proposed plan identify potential sewer capacity issues relating to this allocation. I acknowledge that this is a possible constraint, but it has not been demonstrated that this would prevent the site coming forward for the development proposed within the plan period, and the water authority and the Scottish Environment Protection Agency have not objected to the proposal. No other service or infrastructure provider, including the education authority, has raised concerns about the allocation. Additionally, a representation supporting the site indicates that the landowners are committed to its early release for housing. They also recognise that a contaminated land risk assessment may be required because of the site’s previous use. In the circumstances, I am satisfied that the allocation should be retained on the terms set out in the proposed plan.

8. Overall, no adjustment is required to the proposed plan.

Non-inclusion of sites: LDP-BLO001: Land adjacent to western roundabout

9. The development of this 6 hectare site would extend Balmullo southwards at its south eastern corner. The site comprises fields and is on the eastern side of Main Street (A914). It lies outwith the settlement boundary, and its designation as countryside in the proposed plan is a continuation of its countryside designation in the adopted local plan. The housing allocation BLO 002 lies immediately to the north of the site. The council’s site assessment estimates the site’s capacity as being 80 houses, but a site of this size could accommodate significantly more houses, and I note that a previous study undertaken by Boyack Homes estimates the capacity to be 120 houses.

10. The site is not covered by a landscape designation. I accept that the landscape here is not of a particularly high standard, but it is reasonably pleasing and provides an attractive edge to the village. I note that the site slopes down in a south easterly direction, and it is prominent in views when approaching the village from the south.
While I therefore consider that it contributes to the landscape setting of Balmullo, I do not consider that this would preclude the site from consideration for development if an urgent need for further housing land emerged at the next review of the local development plan. Given the prominence of the site, I believe that the treatment of any new village edge and the general landscaping of the site would require careful consideration, with the principles being set out in the proposed plan. In my view, this important matter has not been satisfactorily addressed in the representation. Given that this would be a large scale allocation and that the greatest part of the village is located to the west of Main Street and north west of the site, I do not consider that development here could be considered a natural rounding off of Balmullo. In the circumstances, I am not satisfied that there are compelling landscape reasons which would justify the allocation of the site for housing at this time. I note that the site comprises prime agricultural land, but this would not preclude it coming forward for development if it formed a component of the settlement strategy of the proposed plan.

11. Local facilities and services, including public transport, could reasonably be accessed from the site on foot. However, there are questions over the extent to which the site would be integrated with the village because it would be separated from it by Balmullo Burn. Vehicular access could be taken to the site off the roundabout at its north western corner, but it is unclear to what extent the site is reliant on housing allocation BLO 002 to provide a secondary access. The council’s site assessment also highlights a potential issue with capacity in both the denominational and non-denominational primary schools. I accept that there is a reasonable prospect that these matters could be resolved, but I believe that this would have to be satisfactorily demonstrated before any allocation was made.

12. I acknowledge that there is a shortfall in meeting the housing land requirement in the SESplan area of Fife together with the uncertainties expressed with regard to the level of that shortfall under Issue 2(b) Homes. However, the conclusions find that adequate housing land has been provided in the TAYplan area in line with requirements set out in the strategic development plan. In addition the 2015 Housing Land Audit has found that there is a 5 year effective housing land supply in both the Cupar and North West Fife and St Andrews and North East Fife Housing Market Areas. Accordingly, there is no strategic numerical justification to allocate further sites for housing within the TAYplan area. Taking this together with my conclusions above, particularly on landscape matters, integration with the village, and the position concerning a secondary access, I consider that the site should continue to be designated as countryside in the proposed plan at this time.

13. In coming to this conclusion, I have taken into account the possibility of allocating a part the site as well as the whole site, the prospect of affordable houses being delivered, the potential of the site to deliver benefits for the whole community, but find that these matters, neither individually nor collectively, justify a housing allocation being made at this location at this time.

14. Overall, no adjustment is required to the proposed plan.

Non-inclusion of sites: LDP-BLO003: Lismore

15. The development of this 3 hectare site would extend Balmullo westwards, to the north of Pitcairn Drive and west of Burnside. The site comprises fields. It lies outwith the settlement boundary, and its designation as countryside in the proposed plan is a
continuation of its countryside designation in the adopted local plan. The representation estimates the site's capacity as being 55 houses, but a site of this size could potentially accommodate more than this.

16. The site is not covered by a landscape designation. It is greenfield, and comprises a pleasant, attractive open area, adjacent to the edge of Balmullo. As such, I agree with the reporter at the examination into the adopted local plan, who concluded that this site is important to the landscape setting of Balmullo. However, I accept that it is bound on 3 sides by housing within the settlement boundary, and that on the fourth side, there is a hedgeline and some trees. While the site slopes upwards towards the north, which increases its prominence in certain views, I consider it to be well defined and contained and, on this basis, believe that its development could be regarded as a natural extension of Balmullo. I therefore consider that this site could reasonably be considered if an urgent need for further housing land emerged at the next review of the local development plan. Given the site’s contribution to the landscape setting of the village and its current links to the countryside, I consider that the treatment of any new village edge and the general landscaping of the site would require careful consideration, with the principles being set out in the proposed plan. In my view, this important matter has not been satisfactorily addressed in the representation. In the circumstances, I am not satisfied that there are compelling landscape reasons which would justify the allocation of the site for housing at this time. I note that the site comprises prime agricultural land, but this would not preclude it coming forward for development if it formed a component of the settlement strategy of the proposed plan.

17. Local facilities and services, including public transport, could reasonably be accessed from the site on foot. This remains the case even though many of the facilities are located either on or close to Main Street, which is on the eastern side of the village. The representation claims that vehicular access could be taken from Pitcairn Drive, with pedestrian links through Burnside. However, the council’s site assessment raises concerns about the proposed access arrangements because Burnside is unadopted and unsuitable for intensification of use, and Pitcairn Drive is a long cul-de-sac, off which accesses should be avoided. This raises questions not only about providing an appropriate access to site, but also the extent to which it would be able to integrate well with the village. The council’s site assessment also highlights a potential issue with capacity in both the denominational and non-denominational primary schools. I accept that there is a reasonable prospect that these matters could be resolved, but I believe that this would have to be satisfactorily demonstrated before any allocation was made.

18. I acknowledge that there is a shortfall in meeting the housing land requirement in the SESplan area of Fife together with the uncertainties expressed with regard to the level of that shortfall under Issue 2(b) Homes. However, the conclusions find that adequate housing land has been provided in the TAYplan area in line with requirements set out in the strategic development plan. In addition the 2015 Housing Land Audit has found that there is a 5 year effective housing land supply in both the Cupar and North West Fife and St Andrews and North East Fife Housing Market Areas. Accordingly, there is no strategic numerical justification to allocate further sites for housing within the TAYplan area. Taking this together with my conclusions above, particularly on landscape matters, integration with the village, and the position concerning access to the site, I consider that it should continue to be designated as countryside in the proposed plan at this time.

19. In coming to this conclusion, I have taken into account the prospect of affordable
houses being delivered, the potential of the site to deliver benefits for the whole community, but find that these matters, neither individually nor collectively, justify a housing allocation being made at this location at this time.

20. Overall, no adjustment is required to the proposed plan.

Non-inclusion of sites: LDP-BLO004: Land at Main Street

21. The development of this 4 hectare site would extend Balmullo eastwards, between Main Street (A914), Clay Road, and Toll Road. The site comprises fields and is relatively flat. It lies outwith the settlement boundary, and its designation as countryside in the proposed plan is a continuation of its countryside designation in the adopted local plan. The representation estimates the site’s capacity as being 75 houses, but a site of this size could potentially accommodate more than this.

22. The site is not covered by a landscape designation. It is greenfield, and comprises a pleasant, attractive, prominent open area, which wraps around the edge of this eastern part of Balmullo. As such, I agree with the reporter at the examination into the adopted local plan, who concluded that the development of this site would represent a significant intrusion into the landscape setting of Balmullo. However, I consider the site to be well defined and contained by the 3 roads, and believe that an appropriately new and improved landscaped settlement edge could be provided. On this basis, I am satisfied that this could be regarded as a reasonable location in which to extend Balmullo. Given the prominence of the site, I believe that the treatment of a new village edge and the general landscaping of the site would require careful consideration, with the principles being set out in the proposed plan. In my view, this important matter has not been satisfactorily addressed in the representation. In the circumstances, I do not consider that there are compelling landscape reasons which would justify the allocation of the site for housing at this time. I note that the site comprises prime agricultural land, but this would not preclude it coming forward for development if it formed a component of the settlement strategy of the proposed plan.

23. Local facilities and services, including public transport, could be conveniently accessed from the site on foot. The site would be well integrated with the village. Appropriate vehicular access could be taken to the site from adjoining roads. The council’s site assessment also highlights a potential issue with capacity in both the denominational and non-denominational primary schools, and potential sewer capacity issues. I accept that there is a reasonable prospect that these matters could be resolved, but I believe that this would have to be satisfactorily demonstrated before any allocation was made.

24. I acknowledge that there is a shortfall in meeting the housing land requirement in the SEPlan area of Fife together with the uncertainties expressed with regard to the level of that shortfall under Issue 2(b) Homes. However, the conclusions find that adequate housing land has been provided in the TAYplan area in line with requirements set out in the strategic development plan. In addition the 2015 Housing Land Audit has found that there is a 5 year effective housing land supply in both the Cupar and North West Fife and St Andrews and North East Fife Housing Market Areas. Accordingly, there is no strategic numerical justification to allocate further sites for housing within the TAYplan area. Taking this together with my conclusions above, particularly on landscape matters, I consider that the site should continue to be designated as countryside in the proposed plan at this time.
25. In coming to this conclusion, I have taken into account the prospect of affordable houses being delivered, the potential of the site to deliver benefits for the whole community, but find that these matters, neither individually nor collectively, justify a housing allocation being made at this location at this time.

26. Overall, no adjustment is required to the proposed plan.

Non-inclusion of sites: Other sites

27. The development of these 3 sites, which extend in total to 53 hectares, would expand Balmullo to the west and south of Pitcairn Drive, and to the south east of the village and the A914. The sites comprise fields which, in broad terms, slope up towards the north. Site 1 extends to 7 hectares, and lies to the west of Pitcairn Drive. Site 2 extends to 13 hectares, and lies to the south of Pitcairn Drive and site 1. Site 3 extends to 33 hectares, and lies to the south east of the village and the A914. They lie outwith the settlement boundary, and their designation as countryside in the proposed plan is a continuation of their countryside designation in the adopted local plan. No estimate of the capacity of the proposed development area is provided but, given its total size, it could clearly accommodate a very large number of houses.

28. The sites are not covered by a landscape designation. While there is a quarry to the west, I note that the sites are greenfield, and I am of the view that they form a pleasant, attractive, open and prominent area of countryside. Development of them would significantly detract from the landscape setting of the village. I accept that site 1 is partially screened because of a shallow dip in the ground, but it rises towards the north and I believe that development of a large part of it would be likely to be prominent. Sites 2 and 3 would extend the southern edge of the village a considerable distance southwards, would be visible from the southern approaches to Balmullo, and would be likely to have a significant adverse landscape impact. Site 3 is separated from the village by LDP-BLO001 (Land adjacent to western roundabout), and it would be inappropriate to bring it forward without first allocating and developing the latter site. If these sites were to proceed, I consider that the treatment of a new extensive village edge and the general landscaping of the site would require careful consideration, with the principles being set out in the proposed plan. In my view, this important matter has not been addressed appropriately in the representation. In the circumstances, I do not consider that the release of these sites can be reasonably justified in landscape terms.

29. It is not clear to me from the representation that local facilities and services, including public transport, could be acceptably accessed from the sites on foot. I am also not satisfied that the sites would be well integrated with the village. In particular, access to site 1 is proposed along the line of a farm track which runs to the south of the village up to the roundabout on the A914, and no links are proposed to the existing housing area to the north. Access proposals for the other sites have not been specified. Issues highlighted with other sites proposed in the village are also likely to apply to these 3 sites. These include a potential issue with capacity in both the denominational and non-denominational primary schools, and potential sewer capacity issues. I accept that it may be possible to resolve these matters, but I believe that this would have to be satisfactorily demonstrated before any allocation could be made.

30. I acknowledge that there is a shortfall in meeting the housing land requirement in the SESEplan area of Fife together with the uncertainties expressed with regard to the level of that shortfall under Issue 2(b) Homes. However, the conclusions find that
adequate housing land has been provided in the TAYplan area in line with requirements set out in the strategic development plan. In addition the 2015 Housing Land Audit has found that there is a 5 year effective housing land supply in both the Cupar and North West Fife and St Andrews and North East Fife Housing Market Areas. Accordingly, there is no strategic numerical justification to allocate further sites for housing within the TAYplan area. Taking this together with my conclusions above, particularly on landscape matters, access to the sites, and integration with the village, I consider that these sites should continue to be designated as countryside in the proposed plan. I also believe that it would be inappropriate to allocate these sites because they have not been included in the initial candidate site selection process, and have therefore not been subject of site assessments or public consultation.

31. Overall, no adjustments are required to the proposed plan.

DRUMOIG

DRG 001: Drumoig

32. DRG 001 is allocated for housing, commercial leisure, and community facilities in both the proposed plan and adopted local plan. No site boundaries for the allocation are provided on the settlements plans. The indicative location provided shows that the allocation falls outwith the boundaries of the 2 separate areas that make up Drumoig. The proposed plan indicates that the site extends to just over 29 hectares, and that the estimated capacity of the site would be 30 houses. The site contributes to meeting the housing land requirement.

33. Drumoig is a relatively recent settlement with construction beginning over 20 years ago. It is based on 3 culs-de-sac containing approximately 120 houses. There is also a hotel, office units, and associated parking. Around and between the 2 areas making up Drumoig are some golf related facilities, including a full golf course and a golf driving range. There is a notable lack of local community services serving the settlement. The adopted local plan indicates that a modest increase in housing numbers could begin to encourage the introduction of the required local services. I believe this to be a reasonable approach, and am satisfied that the estimated capacity of 30 houses represents a modest increase which is proportionate to the existing number of houses. The final number of houses would emerge as part of the planning application and would follow more detailed work on the proposal. Such development could also potentially help link the 2 distinct areas of the settlement, creating a more cohesive form. I consider that it is reasonable to include commercial leisure activities as a part of the application because it would allow the proposal to reasonably build on the existing golf related facilities. The size of the site allocated in the proposed plan is justified by the nature of the uses proposed for this allocation, in particular those related to the golfing facilities.

34. While some concerns were expressed about the proposed allocation, I am satisfied that the development requirements in the proposed plan establish appropriate principles for bringing forward an acceptable proposal. They include the preparation of a development framework, which should be based on high quality urban design, and a principle that housing development alone will not be considered favourably. The access arrangements to Drumoig from the main road (A92) appear adequate, and I do not consider that the traffic generated by the proposed allocation would be likely to give rise to road safety problems. I also note that the roads authority has not objected to the proposed allocation. The site is of a sufficient size to ensure that the nearby scheduled
ancient monument (Comerton House) and its setting, and the character and appearance of the nearby listed buildings and their settings (Vicarsford Cemetery [category B] and Lady Leng Chapel [category A]) could all be reasonably protected. The proposed plan includes a principle requiring the protection of the scheduled ancient monument, and Historic Environment Scotland has not expressed concern about cultural heritage interests. Other principles require the provision of a local shop and well integrated greenspace. The promoter of the site supports the allocation, and indicates that the intention is to bring the site forward for development in the short term.

35. The planning application referred to in the representations, and in the response by the council, was withdrawn in May 2015. A further application for planning permission in principle (application number 15/01977/PPP) for residential dwellings, class 1 shop, extensions to hotel and recreational/leisure/commercial activities was refused by the council in November 2016. This decision was appealed (PPA-250-2242), and a notice of intentions letter was issued in June 2016 indicating that the reporter was minded to allow the appeal and grant planning permission subject to 8 conditions, and a planning obligation (relating to affordable housing and play provision) under section 75 of the 1997 Town and Country Planning (Scotland) Act (as amended). The proposed plan reasonably requires affordable housing to be provided on housing sites such as this. While concern is expressed about the provision of a house for the driving range manager, the representation has been overtaken by events because planning permission for a house (to provide such a facility) was granted on appeal in June 2016 (PPA-250-2244). Combining the notice of intention to grant planning permission in principle for a mixed use development which seems to broadly reflect the intention of the allocation in the proposed and adopted plans, the grant of planning permission for a separate house, and all the other factors referred to above, I consider that DRG 001 should be retained in the plan.

36. Overall, no adjustments are required to the proposed plan.

GAULDRY

GAU 001: Priory Road North

37. GAU 001 is situated at the north eastern edge of Gauldry, to the east of Crawford Avenue, and to the north of Priory Road. It extends to one hectare, and comprises a part of a field. Its allocation for housing in the proposed plan is a continuation of its housing allocation in the adopted local plan. The estimated capacity of the site is 20 houses. The site contributes to meeting the housing land requirement, and its development would allow for a modest expansion of Balmullo, in line with the proposed plan’s settlement strategy.

38. The proposed extension of the allocation would be of a similar size, and would comprise the area immediately to the north. It lies outwith the settlement boundary, and its designation as countryside in the proposed plan is a continuation of its countryside designation in the adopted local plan. The representation estimates the capacity of the extension as being 20 houses, giving a total capacity of 40 houses for it and the allocation.

39. The proposed extension lies within a local landscape area. It gently slopes up towards the north, continuing the slope on the allocated site. It rises to a ridgeline, which runs across the site in an east to west direction, and a right of way. The extension forms
an attractive, open and prominent greenfield area, which makes an important contribution to the landscape setting and identity of Gauldry. I share the concern of the reporter at the examination into the adopted local plan that if the skyline is broken in views from the north, there would be an impression of ridgeline development. I consider that this would have a significant adverse effect on the landscape setting of the village, and that building on this higher ground would be seen as dominant development. I note that the proposed plan includes a requirement that development on GAU 001, which is further down the slope, should not break the skyline when viewed from the northern road access from Wormit. I consider that development higher up the slope towards the ridgeline creates a far greater risk of breaking the skyline. While the representation contends that views from the north could be appropriately screened through landscaping and scale of building, it does not show how this would be achieved on site and the likelihood of it being a successful treatment. In the circumstances, I do not consider that the release of the site is justified in landscape terms. I note that the site comprises prime agricultural land, but this would not preclude it coming forward for development if it formed a component of the settlement strategy of the proposed plan.

40. Local facilities and services, including public transport, could be accessed from the extension on foot. The extension would be integrated with the village to a similar extent as the allocated site. Appropriate vehicular access could be taken to the extension through the allocated site which, in turn, would take access from Priory Road. The council’s site assessment highlights potential sewer capacity issues at this location. I accept that there is a reasonable prospect that this matter could be resolved, and note that it is referred to as one of the development requirements for the allocated site. However, I believe that it would be best if it was demonstrated that this matter could be resolved satisfactorily before any further extended allocation was made.

41. I acknowledge that there is a shortfall in meeting the housing land requirement in the SESplan area of Fife together with the uncertainties expressed with regard to the level of that shortfall under Issue 2(b) Homes. However, the conclusions find that adequate housing land has been provided in the TAYplan area in line with requirements set out in the strategic development plan. In addition the 2015 Housing Land Audit has found that there is a 5 year effective housing land supply in both the Cupar and North West Fife and St Andrews and North East Fife Housing Market Areas. Accordingly, there is no strategic numerical justification to allocate further sites for housing within the TAYplan area. Taking this together with my conclusions above on landscape matters, I consider that the site should continue to be designated as countryside in the proposed plan.

42. The allocated site is well contained to the east, west and south by existing housing. An area of ancient woodland lies immediately to the east of the site. The council proposes that an additional development requirement be inserted in the proposed plan which would ensure that the woodland was appropriately protected by a buffer zone. I agree that such a requirement could provide appropriate protection. I therefore believe that the proposed plan should be changed to include a reference to the ancient woodland, and the need for a buffer zone, the exact extent of which should be determined following a detailed survey. I consider that such a change would satisfactorily address the terms of the representation.

43. Overall, an adjustment is required to the proposed plan, as set out below.
Non-inclusion of sites: LDP-GAU002: Balgove Road

44. The development of this 1.8 hectare site would extend Gauldry southwards between Balgove Road, Balgove Avenue and Woodend Road. The site comprises a part of a field and slopes gently away towards the south. It lies outwith the settlement boundary, and its designation as countryside in the proposed plan is a continuation of its countryside designation in the adopted local plan. The representation estimates the site’s capacity as being 40 houses.

45. The site lies within a local landscape area. It forms an attractive greenfield area on the edge of Gauldry and, as such, contributes to the landscape setting and identity of the village. I note that at the examination into the adopted local plan, a larger proposed housing site (7.2 hectares in total) at this location was considered. It included land to the east and south. While I accept that the current proposed site is much smaller, I am concerned that its allocation could make a much larger area inappropriately vulnerable to development. This is particularly so when account is taken of the landscape masterplan, which shows the strongest proposed landscape boundary treatment to the site’s western edge, facing the village, and the weakest proposed boundary treatments to the more open southern and eastern edges, which face fields and attractive countryside, and which contribute significantly to the village’s wider landscape setting. In the circumstances, I am not persuaded that there is a good landscape justification for releasing the site.

46. I am concerned about the vehicular access arrangements to the proposed site, which would be taken from Balgove Road to the north through land occupied by a house, and which would involve an increase in the width of Balgove Road at this point. I agree with the reporter to the previous examination that such an access would be contrived. Development would also be behind the houses on Balgove Road, Balgove Avenue, and the northern end of Woodend Road, extending the village to the south. Bearing these factors in mind, I consider that development, even of the reduced area, would result in an awkward extension, which would not be particularly well integrated with, or connected to, the village, and which would not reflect the predominant grain of development and settlement form. In coming to this view, I have taken into account the various pedestrian access points proposed to the site and the location of local facilities and services. The council’s site assessment highlights potential sewer capacity issues at this location. I accept that there is a reasonable prospect that this matter could be resolved, but I believe that this would have to be satisfactorily demonstrated before any allocation could be made.

47. I acknowledge that there is a shortfall in meeting the housing land requirement in the SESplan area of Fife together with the uncertainties expressed with regard to the level of that shortfall under Issue 2(b) Homes. However, the conclusions find that adequate housing land has been provided in the TAYplan area in line with requirements set out in the strategic development plan. In addition the 2015 Housing Land Audit has found that there is a 5 year effective housing land supply in both the Cupar and North West Fife and St Andrews and North East Fife Housing Market Areas. Accordingly, there is no strategic numerical justification to allocate further sites for housing within the TAYplan area. Additionally, TAYplan focuses the majority of new development on the principal settlements in this part of the plan area, and Gauldry is not identified as a principal settlement. While TAYplan provides for some development in settlements that are not defined as principal settlements, I am satisfied that Gauldry already provides a reasonable housing allocation at GAU 001 (Priory Road North). Taking these factors
together with my conclusions above on landscape matters, access and settlement form, I consider that the site should continue to be designated as countryside in the proposed plan.

48. Overall, no adjustment is required to the proposed plan.

GUARDBRIDGE

Guardbridge Issues

49. The proposed plan includes 2 housing sites and one housing opportunity site in Guardbridge, with a total estimated capacity of 406 houses. A further site has planning permission for housing at Toll Road (planning applications 14/01288/FULL and 13/01004/FULL) at the north western tip of the village, but it is not included in the proposed plan. Its omission from the proposed plan is an error. The council states that it proposes a factual amendment to the proposed plan. In its response to FIR 91, it explains that, as the development of 66 affordable houses is now complete, the most appropriate way to include the site in the proposed plan would be by placing it within the settlement boundary rather than outwith it. The council indicates that it would be unnecessary to identify the site as a proposal in the proposed plan. The representor is satisfied that this approach adequately addresses the terms of its representation. Ideally, this site should have been included in the proposed plan as a proposal. However, as the development has been completed, and as it has contributed to the housing land supply through its inclusion in the 2015 Housing Land Audit, I am satisfied that it would be reasonable to recognise this development by doing no more than placing it within the settlement boundary as shown on the plan included by the council in its response to FIR 91.

50. A further representation indicates that the additional houses constructed and proposed in Guardbridge could impact on healthcare services. I note that the planning authority indicates that organisations such as NHS Fife were consulted on the proposed plan. While further consultations and discussions with NHS Fife may be considered desirable, or even necessary, I am satisfied that they do not require a development plan context, and a reference in the proposed plan, to take place.

51. Overall, an adjustment is required to the proposed plan, as set out below.

GUA 002: Motray Park

52. GUA 002 is situated on the western edge of Guardbridge, to the south of Motray Water. It extends to just under 2 hectares, and comprises in the main, a relatively flat, open and overgrown area. Its allocation for housing in the proposed plan is a continuation of its housing allocation in the adopted local plan albeit that, in the former plan, it covers a smaller area as the reservoir to the east is now excluded from the allocation. The estimated capacity of the site is 49 houses. The site contributes to meeting the housing land requirement, and its development would allow for the expansion of Guardbridge, in line with the proposed plan’s settlement strategy. I note that TAYplan identifies Guardbridge/Leuchars as a tier 3 settlement. Such settlements have the potential to play an important but more modest role (than settlements in tiers 1 and 2) in the regional economy, and can accommodate a small share of the region’s additional development.
53. I agree that it would be appropriate for the proposed plan to include a reference to planning application 13/02959/PPP, which granted planning permission in principle on site for 49 residential units with associated parking and landscaping, on 1 October 2014. The proposed plan includes 3 green network priorities for the allocation. These are not included in the adopted local plan. The representation expresses concern about 2 of the priorities. One seeks to establish an access link along the disused railway line which runs along the western edge of Guardbridge, and the other seeks to deliver a recreational access link along the edge of the development (by the reservoir) to establish a short round route.

54. The council accepts that the developer does not own or control the disused railway line. Given this, I consider that there is no certainty that these requirements can be delivered, and believe that it is unreasonable to retain them in the proposed plan in their current form. However, I note the council’s aim for a footpath to be provided along the disused railway line to provide a connection to the primary school and proposed community woodland (GUA 005), and believe that it would be reasonable for the council to include a requirement to allow an appropriate link to the disused railway line and potential future footpath connections along this route. I am also of a view that there is a prospect that these matters could be controlled through the conditions attached to the planning permission in principle which require, amongst other things, further approval of the position and width of all proposed footpaths, including public access provision, and a detailed plan showing proposed open space and landscaped areas. Additionally, it is possible that the planning permission in place may not be implemented, and that a further planning application may come forward in the future which could also take into account these requirements. As the developer does not own or control the disused railway line, I accept that a “short round route” cannot be provided as required in the second priority, and that it should be deleted. Both green network priorities therefore require to be changed.

55. Overall, adjustments are required to the proposed plan, as set out below.

GUA 003: Seggie Farm

56. GUA 003 wraps around the south western edge of the built up area of Guardbridge, to the west of Main Street. It extends to over 14 hectares, and has 2 parts, with the larger part being to the south, and the smaller part to the north. It is greenfield, and well contained by attractive woodland, particularly the southern part of the site. Its allocation for housing in the proposed plan is a continuation of its housing allocation in the adopted local plan, albeit that the phasing proposed in the latter plan has now been removed. The allocation is linked, and adjacent, to the community woodland/open space allocation GUA 005. Both allocations are to be covered by a single masterplan. The estimated capacity of the whole site is 350 houses. The site contributes to meeting the housing land requirement, and its development would allow for the expansion of Guardbridge, in line with the proposed plan’s settlement strategy. It is an important part of the housing land supply and, along with other sites, has the potential to relieve nearby St Andrews of some of its housing led development pressures. I note that TAYplan identifies Guardbridge/Leuchars as a tier 3 settlement. Such settlements have the potential to play an important but more modest role (than settlements in tiers 1 and 2) in the regional economy, and can accommodate a small share of the region’s additional development.

57. The woodland surrounds most of the southern part of the site, and forms a prominent feature in the area. It includes ancient woodland. The proposed plan
requires that the existing woodland should be retained as far as possible, and that no development should be within 10 metres of it. This requirement is not included in the adopted local plan. I accept that some woodland may be lost in order to provide a satisfactory access. The representation seeks to prevent development being taken forward unless sufficient buffering is provided between it and the woodland. It refers to the 10 metre buffer zone required by the proposed plan. I agree that a buffer zone of sufficient width could provide appropriate protection for the woodland remaining. The council indicates that appropriate survey work will be carried out as part of any planning application for the site. I believe that the width of the buffer zone is best established once a detailed survey has been completed, as it may be that the zone should be more or less than the standard 10 metres highlighted. In my view, the plan should therefore be changed to indicate a need for a buffer zone, the exact extent of which should be determined following a detailed survey. I am satisfied that such a change would appropriately address the concern expressed in the representation.

58. Overall, an adjustment is required to the proposed plan, as set out below.

GUA 004: Site of Former Curtis Fine Papers

59. GUA 004 is situated on the eastern edge of Guardbridge between Main Street, and the River Eden and the Eden Estuary. It extends to over 9 hectares and comprises, in the main, a complex of industrial buildings, which was in use as a paper mill up to 2008, when it closed. St Andrews University acquired the site in 2010. Its allocation for employment in the proposed plan is a change from its allocation as an area of mixed use, including housing, in the adopted local plan. In both the proposed plan and the adopted local plan, there is a protected open space designation in the southern part of the allocation.

60. In October 2014, planning permission in principle (14/01933/PPP) and planning permission (14/02344/EIA) were granted for the redevelopment of the site. The latter permission proposes a renewable energy centre, biomass fuel storage and processing, and district heating pipeline works. The former permission proposes university (class 10) and business related uses comprising ongoing industrial, storage, distribution and office uses, with research and development (class 4). The permissions cover a larger site than the allocation shown in the proposed plan. The aim of the permissions is to create a sustainable power and research campus. The framework/masterplan proposed as a part of the applications shows 3 zones – zone 1, an energy centre in the eastern part of the allocation; zone 2, sustainable power and research campus activities (industry, research and testing) in the central and southern parts of the site; and zone 3, other industry, storage, offices and other support functions in the western part of the allocation and in the buildings fronting Main Street.

61. In essence, the allocation in the proposed plan seeks to take into account the proposals outlined in the 2 permissions. The development requirements in the proposed plan include a requirement for a development framework, incorporating the key elements of the university’s aspirations for the site, and another requirement for the delivery of a minimum of one hectare (net developable area) of serviced employment land. The representation requests the removal of the 2 requirements. The council believes that the requirement for a development framework should be retained, and that the requirement for serviced employment land should be changed to reflect the council’s approach in the planning permission in principle.
62. The proposed plan does not refer to the planning permission in principle and planning permission that have been granted for the allocation. I accept that the permissions provide a broad framework for taking forward the development of the site. I also note that condition 17 of permission in principle 14/01933/PPP requires that all future detailed applications shall accord with the masterplan approved through the planning permission. I consider that the proposed plan has been overtaken by events, and that it should refer to the 2 permissions for the site and their general terms. However, I agree with the council that retaining a reference to a requirement in the proposed plan for a development framework would be appropriate to allow for possible changes to the proposals and new applications coming forward. If new uses are proposed as part of any change, they should be the subject of appropriate community engagement and consultation prior to any approval by the council.

63. Condition 20 of permission in principle 14/01933/PPP requires the final form of development to deliver a minimum of one hectare of employment land or 3500 square metres of gross floor space for classes 4 or 5 industrial uses separate from any uses directly related to the biomass energy centre shown in zone one or class 10 (university) activities. Given that the permission retains the option of the developer delivering a minimum of one hectare of employment land, I do not consider that it is necessary to delete the requirement from the proposed plan. However, I believe that it would be appropriate to update the proposed plan to include the alternative possibility set out in condition 20.

64. I note that in the proposed plan the Habitats Regulations Appraisal Mitigation measures for this allocation are repeated in slightly different forms. This may cause some confusion. However, I have not made a recommendation on this matter because it has not been the subject of any representation.

65. Overall, adjustments are required to the proposed plan, as set out below.

LEUCHARS

Leuchars issues

66. The site is situated in the centre of Leuchars, on the northern side of Main Street at its junction with Station Road, by the Commercial Arms. Its designation as protected open space is a continuation of its protected open space designation in the adopted local plan. Planning permission (11/02818/FULL) was granted for the erection of 2 dwellinghouses on a large part of the designated area by the Fife Planning Review Body, in January 2013. The 2 dwellinghouses have now been built.

67. The representation highlights the permission, and expresses concern that the development may impair access for the off road cycle route proposed in LEU 001, and the connection of the existing core path to LEU 001. The council believes that there may be merit in removing the protected open space designation on the land approved for residential use. I consider that the proposed plan has been overtaken by events, and that it would be inappropriate to retain a protected open space designation on land where 2 houses have been recently approved and constructed. The council explains that the core path passing through the site will be retained through its diversion, and that this is a condition of the planning permission. I note that provision has been made for a track alongside the new houses, and believe that this would provide an adequate link from Main Street to LEU 001 and the remainder of the core path, including as a cycle route.
68. Overall, an adjustment is required to the proposed plan, as set out below.

**LEU 001: The Castle Field/Doocot Field**

69. LEU 001 is situated at the north western edge of Leuchars, on the eastern side of Main Street, by Leuchars Castle Farm. It extends to around 16 hectares, and comprises fields. A category A listed castle doocot lies within the site, and the Leuchars Castle settlement scheduled ancient monument is partially within the site. Its allocation for housing in the proposed plan extends the housing allocation shown in the adopted local plan. The latter allocation only includes the field nearest to Leuchars (the Doocot Field). However, the allocation in the adopted local plan also refers to a large post 2018 phase of development on land to the south and east of the site. This area is designated countryside in the proposed plan. The estimated capacity of the allocation in the proposed plan is 200 houses. The site contributes to meeting the housing land requirement for the St Andrews and North East Fife Housing Market Area, and its development would allow for the expansion of Leuchars, in line with the proposed plan’s settlement strategy. It is an important part of the housing land supply and, along with other sites, has the potential to relieve nearby St Andrews of some of its housing led development pressures. I note that TAYplan identifies Guardbridge/Leuchars as a tier 3 settlement. Such settlements have the potential to play an important but more modest role (than settlements in tiers 1 and 2) in the regional economy, and can accommodate a small share of the region’s additional development. The fact that there may potentially be a surplus of Ministry of Defence houses in the village is a separate matter, which does not have a bearing on this allocation.

70. The adopted local plan indicates that the southern part of the allocation shown in the proposed plan (the Doocot field) gained planning permission for housing in 2008 (07/00073/EOPP), subject to a section 75 agreement. An application for approval required by conditions (11/06066/ARC) for 129 houses was lodged in 2011. This application appears to have been withdrawn in 2013. It seems that the intention had been to submit a further application for 12 houses at a later date, once ecological issues had been satisfactorily addressed. This would have resulted in a total of 141 houses on site.

71. I believe that it is necessary to include the Doocot Field in the allocation in the proposed plan to ensure that any subsequent development is properly integrated with Leuchars. I am satisfied that its inclusion in the allocation would be unlikely to result in a significantly adverse effect on the doocot or Leuchars Castle settlement themselves or their setting. The proposed plan requires the layout and design of any development to protect the site and setting of the listed building and scheduled ancient monument. It also requires additional public greenspace to protect the setting of built heritage assets, amongst other things. To this end, it appears that the south eastern part of the site, which is behind the properties facing Main Street and by the doocot and scheduled ancient monument, is to be included as part of the indicative proposed green network. Importantly, I note that Historic Environment Scotland has not objected to the housing allocation. While the doocot has a natural heritage interest as a potential roost for bats or barn owls, Scottish Natural Heritage has also not objected to the allocation. With an estimated density of between 12 to 13 houses per hectare, which would be well below a more standard density of between 20 to 25 houses per hectare (18 to 20 houses per hectare was proposed in the 2011 detailed application), I am satisfied that there would be ample opportunity to devise an appropriate layout and design which would properly protect the doocot and settlement and their setting, and any natural heritage interest.
72. I consider that the extended allocation shown in the proposed plan would create a reasonably logical development site, as it would be well defined and contained by the track to Leuchars Castle Farm. While I acknowledge that the site is in a relatively open edge of settlement location, I note that the proposed plan requires sensitive design and landscaping, which recognises its prominence when approaching Leuchars. I am not persuaded that it would be appropriate to extend the allocation into a part of the field on the opposite side of the track because this area is neither well defined nor contained. Furthermore, if such an extension was combined with the omission of the Doocot Field from the allocation, it would only increase the sense of separation between Leuchars and any development, making it more difficult to provide a satisfactory high quality gateway to the village, as required by the green network priorities set out in the proposed plan. In the circumstances, I consider that the extent of the housing allocation should remain as shown in the proposed plan.

73. The proposed plan requires 2 access points from the A919 into the allocation. I see no good reason why a main road such as this should not be able to reasonably accommodate the traffic that would be generated by the allocation. This remains the case even taking into account the additional traffic that may arise in the area from the presence of the army base. I accept that further measures to mitigate the impact of any development on the existing road network may be required, including in the village itself, but am satisfied that they could reasonably be established through the transport assessment required for this allocation in the proposed plan. Significantly, the roads authority has not objected to the allocation. I believe that the best route for accessing the proposed greenspace is a detailed matter, which can most appropriately be determined at the planning application stage. It does not prevent the allocation’s inclusion in the proposed plan. Concern was expressed about additional pressures that would be imposed on other local facilities and services. However, no service or infrastructure provider, including the education and health authorities, has raised concerns which would undermine the allocation. I also note that the council indicates that steps have been taken to ensure adequate services and infrastructure provision. I therefore consider the allocation in the proposed plan to be satisfactory.

74. Overall, no adjustment is required to the proposed plan.

NEWPORT ON TAY AND WORMIT

Newport on Tay and Wormit Issues

75. Housing market areas, not individual settlements, are the geographical areas used to determine housing land requirements. Scottish Planning Policy explains that one of the roles of the planning system is to identify a generous supply of land for each housing market area to support the achievement of the housing land requirement. The overall adequacy of the supply across this part of the plan area is considered in detail at Issue 2(b).

76. Newport on Tay and Wormit are within the St Andrews and North East Fife Housing Market Area. TAYplan sets out the average annual housing market build rate required across the housing market area to ensure an appropriate supply of housing land is provided. It focuses the majority of new development on the principal settlements in this part of the plan area. Newport on Tay and Wormit, along with Tayport, are identified as a principal settlement (as a part of the Dundee Core Area) in TAYplan. The council explains that the identification of this core area allows greater scope for the
consideration of cross-boundary issues. In order not to jeopardise the delivery of the regeneration proposals in Dundee itself, the St Andrews West Strategic Development Area, or a range of housing allocations in other locations across the housing market area, I consider that it would be inappropriate to make any further large scale greenfield housing allocation in Newport on Tay and Wormit, and/or Tayport.

77. I note that the plan proposes 362 houses spread over 5 sites, with the greatest number of houses focussed on 3 sites at the southern western edge of Wormit (212 houses). It also proposes a more general development opportunity. I note that the allocations are a continuation of either allocations or longer term development opportunities identified in the adopted local plan, and that they were considered at the examination into that plan. The Firth of Tay to the north, and the rising ground to the south to a large extent determine the general urban form of Newport on Tay and Wormit, and limit the scope for new development. I consider that the allocations appropriately take into account the urban form, appear proportionate to the size of the settlement and integrate with it, and provide a reasonable response to the housing land requirement. I am not persuaded that allocations of the scale proposed would be likely to result in an unreasonable increase in population or in unacceptable traffic congestion. Instead, I consider that the allocations offer an appropriate balance between delivering the objectives of this core area tier 1 settlement and protecting the character, both physical and social, of Newport on Tay and Wormit. There is a preference to focus development on brownfield land, but I accept that there are insufficient brownfield sites. Within that context, it is necessary and acceptable to allocate greenfield sites as well.

78. Inevitably, the expansion of Newport on Tay and Wormit could potentially result in increased pressure on community facilities. I note that the plan has not been prepared in isolation, and that the council has consulted a range of service providers, including the education, health and road authorities. None have objected in principle to the allocations in the proposed plan. The council also indicates, and I accept, that if stress points have been identified, provision could likely be made to mitigate the effects of proposed development. In particular, I note that Policy 4: Planning Obligations of the proposed plan (and Policy 8: Delivering the Strategic Development Plan of TAYplan) could be used to require developer contributions where appropriate, to remedy potential infrastructure and service deficiencies. The council explains that the need for play facilities is assessed as a part of the provision of green infrastructure within new development, and I consider this to be a reasonable approach. In the circumstances, I do not consider that the expansion proposals for Newport on Tay and Wormit could be justifiably rejected on the grounds of increased pressure on community facilities.

79. Overall, no adjustment is required to the proposed plan. I consider the sites allocated in the proposed plan, and one other site, further below.

NEW 001: Ericht Road

80. The general impacts of the allocations in the proposed plan, including NEW 001, on Newport on Tay and Wormit, and their implications for services, including community facilities, are considered above. I also consider the representations promoting a preference for brownfield sites over greenfield ones. I concluded that no adjustment is required to the proposed plan.

81. NEW 001 is situated on the southern edge of Newport on Tay and Wormit, immediately to the east of Ericht Road and Flass Road, and south of Woodhaven
Avenue. It extends to 5.5 hectares, and comprises a steeply sloping field, which slopes down towards the houses to the north and the Firth of Tay. Its allocation for housing in the proposed plan is a continuation of its housing allocation in the adopted local plan albeit that, in the latter plan, about half of the site is identified as a post 2018 phase of development. The estimated capacity of the site is 100 houses. The site contributes to meeting the housing land requirement, and its development would allow for the expansion of Newport on Tay and Wormit, in line with the proposed plan’s settlement strategy. I agree with the council that it would be unreasonable to impose a restriction on this allocation until a substantive start had been made on WOR 001 and WOR 002 because there is no obvious connection between NEW 001 and the other 2 allocations, and because it may restrict the delivery of an effective housing land supply.

82. The site is bound to the north by houses on Woodhaven Avenue and West Acres Drive, and to the east by houses on Erich Road and Flass Road, and it is relatively well contained. Taking these factors, together with the requirement in the proposed plan that development should not break the skyline when viewed from Dundee’s waterfront, I am satisfied that this is an appropriate location in which to expand Newport on Tay and Wormit. The estimated density of the allocation in the proposed plan would be 18-19 houses per hectare. This is not an unusually high figure, and would be acceptable. However, the actual density of any housing development on site would be subject to, and set by, the development management process, taking into account the physical characteristics of the site and area, and the specific requirements for the site. I am satisfied that, based on the estimated density in the proposed plan, it is likely that an acceptable development could be achieved on site.

83. The council highlights that the green network priorities in the proposed plan for the allocation require the existing core path to be upgraded and overlooked by a good development edge, and the provision of a high quality landscape edge along the southern boundary. In response to the representations, the council considers that there may be merit in adding a more general green network priority which acknowledges and protects the nature trails and wildlife corridors bordering the site. I agree that such a reference in the proposed plan should help protect and, where appropriate, enhance these landscape and natural heritage assets, providing a good quality landscape edge and setting for the allocation. The additional requirement would form part of the framework for assessing the detail of a proposal at the development management stage.

84. Concern has been expressed about vehicular access to the allocation. The requirements in the proposed plan indicate that it should be taken from Erich Road and Flass Road. I note that the roads authority has not objected to these arrangements, and I believe them to be reasonable access points. While I accept that the local topography may have some effect on the local road network and that there is a primary school nearby, I can find no basis for concluding that the roads have insufficient capacity to accommodate the allocation. Furthermore, I believe that there would be scope for introducing traffic management measures if required.

85. Overall, an adjustment is required to the proposed plan, as set out below.

**NEW 002: South of Victoria Park**

86. **NEW 002** is situated on the eastern side of Newport on Tay and Wormit to the south of Victoria Street and Tayview Medical Practice, between the A92 to the east and Cupar Road (B995) to the west. It extends to just under 2 hectares, and is open green
space. Its allocation for housing in the proposed plan is a continuation of its housing allocation in the adopted local plan. The estimated capacity of the site is 50 houses. The site contributes to meeting the housing land requirement, and its development would allow for the expansion of Newport on Tay and Wormit, in line with the proposed plan’s settlement strategy.

87. The site is situated on the edge of a predominantly residential area, is well contained by trees, and I am satisfied that housing would be a reasonable land use in this case. The site was considered at the examination into the adopted local plan, and the allocation reflects the recommendations made by the reporters. During that examination, it appears that Transport Scotland required that access to the site be taken from the local road network. That requirement has been carried through into the proposed plan. The roads authority has not objected to this arrangement, and I believe it to be a reasonable and appropriate approach. I can find no basis for concluding that the local roads have insufficient capacity to accommodate an allocation of this relatively modest scale, even taking into account the primary school nearby. If necessary, I believe that there could also be scope for introducing traffic management measures. I am satisfied that this matter and the details of the access arrangements could all reasonably be dealt with as a part of the development management process.

88. Overall, no adjustment is required to the proposed plan.

NEW 003: North west of Forgan Roundabout

89. NEW 003 is situated at the south eastern tip of Newport on Tay and Wormit, to the north west of the Forgan Roundabout, and between the A92 to the east and the B995 to the west. It extends to just under 3 hectares, comprises an undulating field, and contains a filling station on its eastern edge, by the A92. On the opposite side of the B995 is an arts centre. Its allocation as a development opportunity in the proposed plan is essentially a continuation of its area of mixed use allocation in the adopted local plan. The allocation has a minimum requirement for 1.5 hectares of employment land, with the remainder to comprise some or all of a roadside family/business hotel or similar, a nursery, and a 300 square metre shop. The Fife Employment Land Strategy 2014-21 Technical Report indicates that the site is constrained, and that it would be suitable for business use.

90. Given that the site is adjacent to a main road, which is the principal southern approach to the Tay Bridge and provides good links to the main settlements in the area, I am satisfied that the mix of land uses proposed in this case would be appropriate. The site was considered at the examination into the adopted local plan, and the allocation includes the recommendations made by the reporters. While this is an attractive location, I believe that the design of the development can reasonably be addressed at the development management stage. The council acknowledges that the low lying parts of the site are prone to flooding, but considers that sufficient land remains to accommodate the proposed uses. Additionally, I note that the proposed plan requires that a flood risk assessment be carried out, that the Scottish Environment Protection Agency supports this requirement, and that it has not objected to the allocation. I consider that the risk assessment should identify any part of the allocation where development should not be allowed, and that the proposed plan therefore reasonably addresses the issue of flooding.

91. During the previous examination, it appears that Transport Scotland required that
access to the site be taken from the local road network as far as practicable. It also
required that the access arrangements be determined by an appropriate transport
appraisal. These requirements have been carried through into the proposed plan. The
roads authority has not objected to these arrangements, and I believe them to be a
reasonable and appropriate approach. The transport appraisal should consider in detail
the impact of accessing non-roadside service uses from the local road network. It
should also consider any scope for introducing appropriate traffic management
measures. I can find no basis for concluding that local roads have insufficient capacity
to accommodate an allocation of this relatively modest scale, even taking into account
the adjacent primary school. Scottish Planning Policy promotes opportunities for travel
by more sustainable modes, with a focus on walking and cycling. Within this context, I
consider that the provision of a cycling/walking active travel route alongside the B995 to
the roundabout, as part of the green network priorities, to be appropriate. As the
council points out, the route would encourage walking and cycling to the centre of
Newport on Tay, and it has the potential to form part of a possible cycle route from Tay
Bridgehead to Leuchars and beyond.

92. Concerns expressed about road lighting associated with the school and the poor
condition of footpaths fall outwith the scope of this examination.

93. Overall, no adjustment is required to the proposed plan.

WOR 001: Wormit Farm (Housing)

94. WOR 001 is situated on the south western edge of Wormit and Newport on Tay, on
the western side of Naughton Road (B946). It extends to one hectare, and comprises
scrubland, and a category C(S) listed farmhouse, steading and boundary walls, including
a modern industrial style building. Its allocation for housing in the proposed plan is a
continuation of its housing allocation in the adopted local plan. The estimated capacity
of the site is 30 houses. The site contributes to meeting the housing land requirement,
and its development would allow for the expansion of Wormit and Newport on Tay, in
line with the proposed plan’s settlement strategy.

95. I consider the site to be run down and unattractive. The development proposed in
the allocation would allow the appearance of this prominent site and Wormit and
Newport on Tay to be improved. This site is proposed for general mainstream housing.
This could potentially include suitable proposals for elderly and/or sheltered housing,
and the council indicates that such proposals would be likely to be considered favourably
in principle. The adopted local plan does not specifically require elderly and/or sheltered
housing to be provided on site, and I see no good reason for introducing such a
restriction in the proposed plan. It could potentially impose an unnecessary constraint
on bringing this site forward for development. Given that the sites are linked and
adjacent, I consider the local plan requirement to provide an access route through WOR
001 to WOR 003 to be acceptable in principle. I note that such a link would provide an
active travel route, and that it could be combined with a road link. I accept that it may
also allow easier access into Wormit. I deal with the access route required to WOR 004
below, under WOR 004.

96. Overall, no adjustment is required to the proposed plan.
WOR 002: Wormit Sandpit

97. WOR 002 is situated on the south western edge of Wormit and Newport on Tay, on the eastern side of Naughton Road and Kilmany Road (B946). It extends to just under 2 hectares, and comprises scrubland and commercial activities. Its allocation for housing in the proposed plan is a continuation of its housing allocation in the adopted local plan. The estimated capacity of the site is 47 houses. The site contributes to meeting the housing land requirement, and its development would allow for the expansion of Wormit and Newport on Tay, in line with the proposed plan’s settlement strategy.

98. The site is run down and unattractive, and the development proposed in the allocation would allow the appearance of this part of Wormit and Newport on Tay to be improved. This site is proposed for general mainstream housing. This could potentially include suitable proposals for elderly and/or sheltered housing, and the council indicates that such proposals would be likely to be considered favourably in principle. The adopted local plan does not specifically require elderly and/or sheltered housing to be provided on site, and I see no good reason for introducing such a restriction in the proposed plan. It could potentially impose an unnecessary constraint on bringing this site forward for development.

99. Overall, no adjustment is required to the proposed plan.

WOR 003: South of Wormit Farm

100. The general impacts of the allocations in the proposed plan, including WOR 003, on Newport on Tay and Wormit, and their implications for services, including community facilities, are considered above. I also consider the representations promoting a preference for brownfield sites over greenfield ones. I concluded that no adjustment is required to the proposed plan.

101. WOR 003 is situated on the south western edge of Wormit and Newport on Tay, on the western side of Kilmany Road (B946). It extends to just over 5 hectares, and comprises a field, which generally slopes down towards the south. Its allocation for housing in the proposed plan is a continuation of its housing allocation in the adopted local plan albeit that, in the latter plan, about half of the site is identified as longer term development. The estimated capacity of the site is 135 houses. The site contributes to meeting the housing land requirement, and its development would allow for the expansion of Wormit and Newport on Tay, in line with the proposed plan’s settlement strategy.

102. I note that the proposed plan requires WOR 003 to be developed only once a substantive start to construction has been made at both WOR 001 and WOR 002. Given the 3 allocations are linked and adjacent, I consider that this represents a reasonable approach, which reflects the policy preference for developing brownfield sites. I accept that development here would potentially affect views from the B946. However, the council points out that this matter was considered at the examination into the adopted local plan, and I agree with the conclusion of the reporters that the outlook would undoubtedly be altered but that the impact on amenity would not justifiy deleting the allocation. I also agree with their conclusion that a carefully designed development could be integrated into this locality without detriment to its character or its wider landscape setting. I consider that this conclusion applies when WOR 001 and WOR 002 are taken into account as well. The site is not within the local landscape area which
stops at the railway along the western edge of the site. While the allocation may constitute productive farmland, as it forms a part of the settlement strategy, I consider that it is appropriate to retain it in the proposed plan.

103. The roads authority has not objected to this allocation, and I have no reason to believe that the local road network does not have the capacity to satisfactorily accommodate it, and WOR 001 and WOR 002.

104. Overall, no adjustment is required to the proposed plan.

WOR 004: Wormit Farm (rail halt)

105. WOR 004 is situated on the south western edge of Wormit and Newport on Tay, on the western side of Kilmany Road (B946), immediately to the west of WOR 001 and north of WOR 003. It extends to just under 2 hectares, is crossed by a railway, and comprises, in the main, scrubland and a storage area. Its allocation as a new rail halt in the proposed plan is essentially a continuation of its transportation (rail halt) allocation in the adopted local plan. The proposed plan indicates that the site is included in the SEStran Regional Transport Strategy Delivery Plan 2008-2023, but that it is not currently supported in the Strategic Transport Projects Review, and Transport Scotland has no commitment towards funding its delivery.

106. Transport Scotland explains in its representation that, on behalf of Scottish Ministers, it is responsible for the development of the rail network in Scotland, and that their investment priorities to 2032 are set out in the Strategic Transport Projects Review. Scottish Planning Policy indicates that development plans should set out a spatial strategy which is both sustainable and deliverable, providing confidence to stakeholders that the outcomes can be achieved. It also indicates that the strategic case for a new station should emerge from a complete and robust multimodal transport appraisal in line with Scottish Transport Appraisal Guidance, and that agreement should be reached with Transport Scotland and Network Rail before such proposals are included in a development plan.

107. Transport Scotland indicates that Tactran and SEStran undertook a joint study in March 2009 (the Cross Tay Sustainable Transport Study). The proposed station at Wormit was considered, but not recommended for further appraisal because it offered limited attractiveness to other drivers using the Tay Bridge due to the site’s location and the low quality links to the A92. Furthermore, an operating revenue loss was predicted. I note that the proposal was also considered at the examination into the adopted local plan, and that it was retained, subject to changes that recognised there was no funding commitment to it, and that referred to Transport Scotland’s policy and approach to new stations. While the station is supported through TAYplan, given the findings of the March 2009 study, the apparent lack of funding, and the lack of agreement with Transport Scotland, I consider that there is considerable uncertainty about this proposal and whether it can realistically be delivered. The inclusion of such a proposal does not provide confidence for stakeholders that the proposed plan’s desired outcomes can be achieved in a reasonable timescale. In all the circumstances, I do not consider that such a proposal complies with Scottish Planning Policy, or that it should be included in the plan in the form proposed.

108. Taking this conclusion into account, and bearing in mind TAYplan’s support, and the potential benefits of improving connectivity to the main centres and supporting modal
shift, I believe that it would be reasonable to change this proposed rail halt from a firm proposal to a safeguarding, which indicates that it is a long term council aspiration, which is not supported by the Strategic Transport Projects Review, and which has no commitment or approval from Transport Scotland. The reference in the proposed plan to Transport Scotland's policy on promoting better utilisation of the existing network is unnecessary and should be deleted. The plan also indicates that proposed development in Wormit (WOR 001, WOR 002, and WOR 003) may increase demand for a new station, but I doubt whether the estimated capacity of the 3 allocations (212 houses) would be sufficient to justify its provision, and this paragraph should be removed. Given the uncertainty regarding this proposed development and its change of status, the proposed site shown in the inset map for the proposed rail halt should become an indicative location, rather than have precisely defined boundaries. For the same reasons, the requirement in the proposed plan under WOR 001 to transfer the land for the rail halt to the ownership of the council should be deleted. Similarly, the reference to WOR 004 in the green network priorities identified for WOR 001 and WOR 003, and the green network priorities for WOR 004 itself, should be removed. I am satisfied that the settlement boundary at this point, as shown on the inset map, could be retained.

109. Overall, adjustments are required to the proposed plan, as set out below.

Non-inclusion of sites: LDP-WOR001: Kilmany Road

110. The development of this 35 hectare site would extend Wormit and Newport on Tay southwards at its south western edge, along both sides of Kilmany Road (B946). On the eastern side of Kilmany Road, the site extends to 17 hectares and, on the western side of the road, to 18 hectares. The site comprises sloping fields, beyond allocations WOR 002 (Wormit Sandpit) and WOR 003 (South of Wormit Farm) in Wormit. It lies outwith the settlement boundary, and its designation as countryside in the proposed plan is a continuation of its countryside designation in the adopted local plan. The representation estimates the capacity of the first phase (the land to the east of Kilmany Road) as being 200 houses but, given its size, it could clearly accommodate a much larger number of houses. The whole site would be able to accommodate a very substantial number of houses. I note that the representation refers to the creation of a mixed use settlement, including mixed use commercial land use, and the council’s site assessment refers to community infrastructure and transport uses.

111. The site is not covered by a landscape designation. I note that the sites are greenfield, and that they form a pleasant, attractive, open and prominent area of countryside, contributing to the landscape setting and identity of the village. The scale of development would be likely to be such that it would have a material effect on the character, both physical and social, of the settlement, and its landscape setting. This is particularly so when added to the adjacent allocations in Wormit at WOR 001 (Wormit Farm [Housing]), WOR 002 and WOR 003. The prominence of any development would be increased by the fact that the land generally slopes away from the main part of the built up area. Development here would also very significantly and disproportionately extend this linear settlement southwards. In the circumstances, I do not consider that the release of these sites can be reasonably justified in landscape or settlement form terms. I note that the site was considered at the examination into the adopted local plan, and that it was not allocated for development. I consider that if a site of this scale was to proceed, a detailed study would be required to show how its impacts could be reasonably managed and mitigated, with the principles being set out in the proposed
plan. In my view, this important matter has not been addressed appropriately in the representation.

112. While vehicular access to the site could potentially be taken from Kilmany Road, further assessment is required of the overall transportation arrangements, including public transport, for the proposed development. The placing of the access points outwith the settlement boundary raises concerns about the extent to which the allocation would reasonably link to the existing settlement. As the site is at present separated from the bulk of the settlement by WOR 001, WOR 002 and WOR 003, I am not satisfied that local facilities and services could be conveniently accessed from the site on foot, or that the site would be well integrated with the village. The proposed development could give rise to issues with capacity at the local schools, and with service infrastructure. While there is a prospect that these matters could be resolved, I believe that this would have to be satisfactorily demonstrated before any allocation was made.

113. I note that a planning appeal relating to the part of the site on the eastern side of Kilmany Road was dismissed in 2011 (PPA-250-2062). The decision notice draws attention to the number of houses proposed in the appeal (200) and the reasonable housing capacity of this area (about 350 houses). I am concerned at this discrepancy in potential site capacity, because it creates great uncertainty about the number of houses that would ultimately come forward.

114. I acknowledge that there is a shortfall in meeting the housing land requirement in the SEPlan area of Fife together with the uncertainties expressed with regard to the level of that shortfall under Issue 2(b) Homes. However, the conclusions find that adequate housing land has been provided in the TAYplan area in line with requirements set out in the strategic development plan. In addition the 2015 Housing Land Audit has found that there is a 5 year effective housing land supply in both the Cupar and North West Fife and St Andrews and North East Fife Housing Market Areas. Accordingly, there is no strategic numerical justification to allocate further sites for housing within the TAYplan area. Taking this together with my conclusions above on landscape matters, settlement form, access to the site, integration with Wormit and Newport on Tay, and uncertainty about the site’s housing capacity, I consider that the site should continue to be designated as countryside in the proposed plan. Additionally, I note that this proposed allocation goes well beyond any current vision for this locality.

115. Overall, no adjustment is required to the proposed plan.

TAYPORT

Tayport issues

116. Housing market areas, not individual settlements, are the geographical areas used to determine housing land requirements. Scottish Planning Policy explains that one of the roles of the planning system is to identify a generous supply of land for each housing market area to support the achievement of the housing land requirement. The overall adequacy of the supply across this part of the plan area is considered in detail at Issue 2(b).

117. Tayport is within the St Andrews and North East Fife Housing Market Area. TAYplan sets out the average annual housing market build rate required across the housing market area to ensure an appropriate supply of housing land is provided. It
focuses the majority of new development on the principal settlements in this part of the plan area. Tayport, along with Newport on Tay and Wormit, are identified as a principal settlement (as a part of the Dundee Core Area) in TAYplan. The council explains that the identification of this core area allows greater scope for the consideration of cross-boundary issues. In order not to jeopardise the delivery of the regeneration proposals in Dundee itself, the St Andrews West Strategic Development Area, or a range of housing allocations in other locations across the housing market area, I consider that it would be inappropriate to make further large greenfield housing allocations in Tayport and/or Newport on Tay and Wormit.

118. I note that the plan proposes 58 houses spread over 5 sites, with a possible further 15 houses on a sixth site. It also proposes employment and leisure/community opportunities. I note that the allocations for housing are largely a continuation of the housing allocations identified in the adopted local plan, and that they mainly concern brownfield or small infill sites. All of the housing proposals for Tayport in the plan have been the subject of representations. In general terms, even if they were recommended for deletion from the plan, I do not consider that this, in itself, would justify allocating a much larger greenfield housing site instead, which could potentially provide many more houses. In coming to this view, I have taken into account that a number of the sites in the plan are identified as non-effective in the 2015 Housing Land Audit. I also note that some of the sites allocated in the proposed plan are brownfield, and that there is a clear policy preference to bring these sites forward for development, albeit I acknowledge that it has been necessary to allocate greenfield sites in the proposed plan.

119. I consider the sites allocated in the proposed plan in Tayport, and others, further below, including the leisure/recreational/holiday use proposed at the former Ministry of Defence Meteorological Testing Station at Tentsmuir Forest.

120. Overall, no adjustment is required to the proposed plan.

TAY 001: Links Road 2

121. TAY 001 is situated towards the southern edge of Tayport, in a residential area, on the eastern side of Links Road. It extends to 0.1 hectares, and is flat and grassed. Its allocation for housing in the proposed plan is a continuation of its housing allocation in the adopted local plan, albeit that it is identified as an opportunity site in the former. The estimated capacity of the site is 6 houses. The site is identified as non-effective in the 2015 Housing Land Audit. As it is a small, infill site which is situated within the settlement boundary, is in a residential area, could accommodate a residential development of the size proposed, and would be in line with the proposed plan’s settlement strategy, I believe that it is appropriate to identify it as an opportunity for development.

122. Overall, no adjustment is required to the proposed plan.

TAY 002: Net Drying Green

123. TAY 002 is situated by the harbour in Tayport, in a residential area, between Harbour Road, Macduff Drive, and Tay Street. It extends to 0.2 hectares, and is in a poor condition and unattractive. Its allocation for housing in the proposed plan is a continuation of its housing allocation in the adopted local plan. The estimated capacity of the site is 10 houses. This infill site is small and brownfield, situated within the
settlement boundary, is in a residential area, could accommodate a residential development of the size proposed, and would be in line with the proposed plan’s settlement strategy. I therefore believe that it would be appropriate to include it in the proposed plan.

124. A requirement for a flood risk assessment is included in the adopted local plan, and the council indicates that its omission from the proposed plan is an error. I believe that the need for a flood risk assessment in this case should be added to the requirements in the proposed plan. I do not agree that the deletion of the allocation from the plan would be warranted on the basis of a risk of flooding. I note that the Scottish Environment Protection Agency has not objected to the inclusion of this allocation in the plan, subject to a flood risk assessment, and I consider that this is the correct approach. Several allocations have such a requirement in the proposed plan. There seems to be uncertainty over when this site may come forward for development, and I agree with the council that it should be changed to a housing opportunity. I note that it is shown as non-effective in the 2015 Housing Land Audit.

125. Overall, adjustments are required to the proposed plan, as set out below.

TAY 003: North of Spears Hill Road

126. TAY 003 is situated in the western part of Tayport, in a residential area, between Garvie Brae to the west and Spearhill Road to the east. It extends to 0.5 hectares, and is grassed with trees on it. Its allocation for housing in the proposed plan is a continuation of its housing allocation in the adopted local plan. The estimated capacity of the site is 10 houses. This infill site is small, situated within the settlement boundary, is in a residential area, could accommodate a residential development of the size proposed, and would be in line with the proposed plan’s settlement strategy. I therefore believe that it would be appropriate to include it in the proposed plan.

127. I consider that any requirement to protect trees at this location can reasonably be dealt with as a part of the development management process. There seems to be uncertainty over when this site may come forward for development, and I agree with the council that it should be changed to a housing opportunity. Additionally, given that the roads serving the area appear to stop short of the site, it is not clear to me that gaining vehicular access to it would be a straightforward matter. This reinforces my view that the site should be identified as a housing opportunity. I note that it is shown as non-effective in the 2015 Housing Land Audit.

128. Overall, an adjustment is required to the proposed plan, as set out below.

TAY 004: Nelson Street

129. TAY 004 is situated in the southern part of Tayport, in an area of mixed uses, on the northern side of Nelson Street at its junction with Shanwell Road. It extends to 0.1 hectares, is flat, and is predominantly used as a yard and car park. There is a small building at the south western corner. Its allocation for housing in the proposed plan is a continuation of its housing allocation in the adopted local plan, albeit that it is identified as an opportunity site in the former. The estimated capacity of the site is 5 houses. The site is shown as non-effective in the 2015 Housing Land Audit. I note the concern expressed in one representation about flooding on this site, but I am satisfied that this is adequately covered by the requirement in the proposed plan to undertake a flood risk assessment.
assessment, which would consider the extent to which the site could be developed. As it is a small, infill site which is situated within the settlement boundary, is in an area containing housing, could accommodate a residential development of the size proposed, would be in line with the proposed plan’s settlement strategy and, if developed for housing, would potentially improve the townscape, I believe that it is appropriate to continue to identify it as an opportunity for development.

130. Overall, no adjustment is required to the proposed plan.

TAY 005: Scotscraig Works

131. TAY 005 is situated in the southern part of Tayport, in an area of mixed uses, on the southern side of Nelson Street at its junction with Shanwell Road. It extends to just under one hectare, and contains a large, vacant industrial building. Its allocation as a housing opportunity site in the proposed plan is a change from its employment area designation in the adopted local plan. The estimated capacity of the site is 25 houses. The council confirms that it has not been counted towards meeting the housing land requirement.

132. I am satisfied that the risk of flooding on this site is adequately covered by the requirement in the proposed plan to undertake a flood risk assessment, which would consider the extent to which it could be developed. I note that the Scottish Environment Protection Agency has not objected to the inclusion of this allocation in the plan, subject to a flood risk assessment. The Scottish Environment Protection Agency highlights possible contamination issues on site, and requests that a site specific risk assessment be added as a development requirement in the proposed plan. The council indicates that the omission of this requirement is an error. I agree that it should be added to the proposed plan.

133. Overall, an adjustment is required to the proposed plan, as set out below.

TAY 006: Shanwell Road

134. TAY 006 is situated in the southern part of Tayport, in an area of mixed uses, on the eastern side of Shanwell Road at its junction with Nelson Street. It extends to 0.3 hectares, and comprises a car park and grassed area. It is allocated for employment purposes in the proposed plan, but is not covered by a proposal or designation in the adopted local plan. The former indicates that class 4 (business), class 5 (general industrial), and class 6 (storage and distribution) uses would all be appropriate for this site.

135. The proposed plan does not require a flood risk assessment for this allocation. The council indicates that this is a publication error. Given the risk of flooding on site, I believe that a requirement for such an assessment should be added to the plan. Possible contamination issues have also been identified on site, and I agree with the council that a site specific risk assessment should be required in this instance, and that this should also be added as a development requirement for this allocation.

136. Overall, an adjustment is required to the proposed plan, as set out below.
### TAY 007: Abertay Works

137. TAY 007 is situated in the southern part of Tayport, in an area of mixed uses, on the eastern side of Shanwell Road opposite Nelson Street. It extends to just over 2 hectares, and contains a large industrial building and vacant yard. While its leisure/community allocation in the proposed plan is different from its area of mixed use allocation in the adopted local plan, the aim of both allocations is to support a local community group active in promoting a mixed development. The council granted planning permission for the erection of community facilities building and associated works on 1 April 2016. It would provide a community hub, including a multi-use indoor games court, function rooms, and a café. The applicant was the Tayport Community Trust.

138. The proposed plan states that the residential (and employment) use would only commence if the community group was unable to secure planning permission and funding before the end of 2015. While the date for securing planning permission for the leisure/community uses was not met, it has now been obtained, and it appears that this use is being taken forward. In this event, the site would not be used for housing. As things stand, the site does not contribute to the effective housing land supply and the housing land requirement.

139. Even if circumstances change and the site is eventually promoted for residential (and employment) purposes, I consider that this would be a reasonable proposal for the site. I note that the Scottish Environment Protection Agency has not objected to such a proposal on the grounds of flooding or contamination. These issues have been dealt with as part of the application for the leisure/community use. If further work on them is required, I am satisfied that it can reasonably be dealt with as part of the development management process. Furthermore, as this is a brownfield, infill site which is situated within the settlement boundary, is in an area containing housing, would be in line with the proposed plan’s settlement strategy and, if developed, would potentially improve the townscape, I consider its allocation for development in the proposed plan, including the reference to it potentially being used for housing (and employment), to be reasonable and acceptable.

140. Overall, no adjustment is required to the proposed plan.

### Non-inclusion of sites: LDP-TAY001 (Land at Spears Hill)

141. The development of this 11 hectare site would extend Tayport westwards between Spearshill and Reform Street. The site comprises a field, groups of trees, and an open grassed area on its eastern edge. There is an east to west ridge line crossing the site. The field lies outwith the settlement boundary, and its designation as countryside in the proposed plan is a continuation of its countryside designation in the adopted local plan. The open grassed area is within the settlement boundary, and is not affected by any development proposals. The preliminary site appraisal attached to the representation indicates a development on site of around 250 houses.

142. The site lies within a local landscape area, and is a well contained, attractive, pleasant space. It was considered at the previous examination into the adopted local plan, and I agree with the conclusion of the reporters that the existing residential uses adjoining a significant part of the site boundary (3 and a bit sides) are a benefit to the proposal. I believe that this feature would be likely to help absorb a sensitive
development into the existing built up area, without undermining the wider landscape setting of Tayport. It could also be argued that development here would provide a more rational settlement boundary. Furthermore, I note that the council considers that the site has merits. The site comprises prime agricultural land, but this would not preclude it coming forward for development if it formed a component of the settlement strategy of the proposed plan. The council’s site assessment highlights the presence of a scheduled ancient monument in the area. While it may be that this would not affect the development of the site, I believe that this would have to be satisfactorily demonstrated before any allocation was made.

143. Local facilities and services, including public transport, could be conveniently accessed from the site on foot. The site would be well integrated with the village. Appropriate vehicular access could be taken to the site from adjoining roads. The council’s site assessment appears to indicate that there may be potential issues with capacity in the local primary school, and the preliminary site appraisal highlights potential issues with capacity at the waste water and water treatment works. I accept that there is a reasonable prospect that these matters could be resolved, but I believe that this would have to be satisfactorily demonstrated before any allocation was made.

144. I acknowledge that there is a shortfall in meeting the housing land requirement in the SESplan area of Fife together with the uncertainties expressed with regard to the level of that shortfall under Issue 2(b) Homes. However, the conclusions find that adequate housing land has been provided in the TAYplan area in line with requirements set out in the strategic development plan. In addition the 2015 Housing Land Audit has found that there is a 5 year effective housing land supply in both the Cupar and North West Fife and St Andrews and North East Fife Housing Market Areas. Accordingly, there is no strategic numerical justification to allocate further sites for housing within the TAYplan area. I also have concerns that a large scale greenfield release such as the one proposed here could jeopardise a range of housing allocations coming forward across the St Andrews and North East Fife Housing Market Area. I acknowledge that Tayport is identified as a principal settlement (as a part of the Dundee Core Area) in TAYplan, but I believe that the focus in that area should be on the delivery of the regeneration proposals in Dundee itself, and on bringing forward existing housing allocations, including those in Tayport, and Newport on Tay and Wormit. In the circumstances, I do not consider that it would be appropriate to allocate this large greenfield site for housing at this time. I have taken into account the concerns expressed about the scoring system used in the council’s site assessments, but find that they do not outweigh my conclusions on this site.

145. Overall, no adjustment is required to the proposed plan.

Non-inclusion of sites: LDP-LWD008 (Former Ministry of Defence Meteorological Testing Station)

146. This site is beyond the southernmost edge of Tayport. It extends to just under 2 hectares, and is an unused meteorological station. Its designation as countryside in the proposed plan is a continuation of its countryside designation in the adopted local plan. The representation seeks a leisure/recreation/holiday accommodation allocation on site. The site was considered for employment purposes at the examination into the adopted local plan, but the reporters concluded that there was no compelling reason to make such an allocation.
147. The site contains, in part, vacant buildings and hardstanding. It is close to a local landscape area, a scheduled ancient monument, a site of special scientific interest, and a national nature reserve, which incorporates a special conservation area, a special protection area, and a RAMSAR site. There are also potential issues relating to access and flooding. I accept that none of these matters would necessarily prevent the site being allocated, and that there would be benefits in bringing this brownfield area back into use. However, the proposals are very vague. In particular, there is a lack of detail about the extent, nature and mix of the leisure/recreation/holiday accommodation uses proposed. Such information would allow a more informed assessment of the potential impacts of the uses proposed in this sensitive location and whether they would be acceptable. Without this basic information, I do not consider that it would be appropriate or wise to allocate the site for the purposes proposed. I believe that a proposal coming forward for this site could reasonably be considered on its own merits without specific development plan support. The policies in the proposed plan, including Policies 1 (Development Principles) 7 (Development in the Countryside) and 13 (Natural Environment and Access) provide a general and reasonable policy framework for assessing any proposal.

148. Overall, no adjustment is required to the proposed plan.

**Reporter’s recommendations:**

I recommend that the following modifications be made:

1. In reference GAU 001 (Priory Road North), page 86, add 2 new sentences at the end of the additional development requirements to read:

   “A buffer zone to be provided to protect the ancient woodland to the east of the site. The extent of the buffer zone will be determined following a detailed survey.”

2. In the Inset Map for Guardbridge, extend the settlement boundary to include the new affordable housing development at Toll Road, as shown on the plan attached to the council’s response to FIR 91.

3. In reference GAU 002 (Motray Park), page 98, add a new sentence at the beginning of the additional development requirements to read:

   “The site was granted planning permission in principle (13/02959/PPP) for 49 residential units with associated parking and landscaping, on 1 October 2014.”

4. In reference GAU 002 (Motray Park), page 98, adjust the additional development requirements relating to the first 2 bullet points under the green network priorities heading to read:

   “- Allow an appropriate access link to the disused railway line which runs along the western boundary of the site, and potential future footpath connections along this route, to facilitate a connection from the development site to the primary school and the future community woodland at LDP proposal GUA 005 (Seggie Farm).
   - Deliver a recreational access link along the edge of the development, where it bounds the reservoir, and connect to the street network.”
5. In reference GAU 003 (Seggie Farm), page 98, adjust the fifth additional development requirement (the requirement immediately above the green network priorities heading) to read:

“Existing woodland should be retained as far as possible. A buffer zone to be provided to protect it. The extent of the buffer zone will be determined following a detailed survey.”

6. In reference GAU 004 (Site of Former Curtis Fine Papers), page 99, delete the first 2 additional development requirements (the requirements immediately below the status, additional development requirements, and other information heading) and replace them so that they read:

“In October 2014, a planning permission in principle (14/01933/PPP) and a planning permission (14/02344/EIA) were granted for the redevelopment of the site. The former permission proposes university (class 10) and business related uses comprising ongoing industrial, storage, distribution and office uses, with research and development (class 4). The latter permission proposes a renewable energy centre, biomass fuel storage and processing, and district heating pipeline works. The permissions cover a larger site than the allocation shown in the proposed plan. The aim of the permissions is to create a sustainable power and research campus. The framework/masterplan proposed as a part of the permissions shows 3 zones – zone 1, an energy centre in the eastern part of the allocation; zone 2, sustainable power and research campus activities (industry, research and testing) in the central and southern parts of the allocation; and zone 3, other industry, storage, offices and other support functions in the western part of the allocation and in the buildings fronting Main Street. Together, the permissions provide an appropriate framework/masterplan for developing the allocation.

Should proposals come forward in the future, a further development framework/masterplan requires to be provided and agreed with the council. It should reflect the terms of the 2014 permissions. If new uses are proposed, they require to be included in the development framework/masterplan, and they should be the subject of appropriate community engagement and consultation.

There is the potential for some residential accommodation for postgraduate students of the university to be provided as part of the development of the site, in which case a contribution to primary education provision will be required.

The final form of the development shall deliver a minimum of one hectare of employment land or 3500 square metres of gross floor space for classes 4 or 5 industrial uses separate from any uses directly related to the biomass energy centre shown in zone 1 or class 10 (university) activities...”

7. In the Inset Map for Leuchars, remove the protected open space designation from the land which has been approved for residential use under planning permission 11/02818/FULL (the designation is on the northern side of Main Street at its junction with Station Road, by the Commercial Arms).
8. In reference NEW 001 (Ericht Road), page 147, add a further bullet point at the end of the bullet points under the green network priorities heading to read:

   “Protect and, where appropriate, enhance the nature trails and wildlife corridors bordering the site.”

9. In reference WOR 004 (Wormit Farm [Rail Halt]), page 148, delete the description “New Rail Halt” and replace it with “Rail Halt safeguarding.”

10. In reference WOR 004 (Wormit Farm [Rail Halt]), page 148, adjust the first paragraph of the other information so that it reads:

   “The council has a longer term aspiration to see a rail halt provided at Wormit. The project is not supported by the Strategic Transport Projects Review, and there is currently no commitment or approval for it from Transport Scotland.”

11. In reference WOR 004 (Wormit Farm [Rail Halt]), page 148, delete the second and third paragraphs of the other information, and the green network priorities.

12. In the Inset Map for Newport on Tay and Wormit, delete the allocation shown for WOR 004 (Wormit Farm [Rail Halt]), and replace it with a combination of a circle for indicative location and purple for transportation proposal.

13. In reference WOR 001 (Wormit Farm [Housing]), page 148, delete the second additional development requirement, which seeks the transfer of land identified as part of WOR 004 to the council, and delete the term “…and WOR 004…” from the second bullet point of the green network priorities.

14. In reference WOR 003 (South of Wormit Farm), page 148, delete the term “…and WOR 004…” from the second bullet point of the green network priorities.

15. In reference TAY 002 (Net Drying Green), page 176, delete the description “Housing” and replace it with “Housing Opportunity Site.”

16. In the Inset Map for Tayport, replace the housing allocation at TAY 002 (Net Drying Green), with a “Housing Opportunity Site” allocation.

17. In reference TAY 002 (Net Drying Green), page 176, add a new development requirement to read:

   “A Flood Risk Assessment is required. Design of development must take account of the findings of the flood risk assessment.”

18. In reference TAY 003 (North of Spears Hill Road), page 176, delete the description “Housing” and replace it with “Housing Opportunity Site.”

19. In the Inset Map for Tayport, replace the housing allocation at TAY 003 (North of Spears Hill Road), with a “Housing Opportunity Site” allocation.
20. In reference TAY 005 (Scotscraig Works), page 176, add a new development requirement to read:

   “Potential contamination issues on site, and a site specific risk assessment is required.”

21. In reference TAY 006 (Shanwell Road), page 176, add 2 new development requirement: to read:

   “A Flood Risk Assessment is required. Design of development must take account of the findings of the flood risk assessment.”

   Potential contamination issues on site, and a site specific risk assessment is required.”