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1. Purpose of Document

The Publicity and Consultation Statement sets out the steps taken by Fife Council as planning authority to ensure that all relevant parties were aware of, were consulted on, and had adequate opportunity to reply to, the contents of Fife Matters – Consultative Draft Fife Structure Plan 2006 – 2026.

- 1.1 The Fife Structure Plan is part of the Development Plan for Fife. It takes a broad overview of land use and development for the whole of Fife and sets out strategic planning policies.
- 1.2 The Structure Plan:
 - Sets out a direction and a long term vision for the economy and environment of Fife to 2026 and beyond;
 - Covers the period from 2006 to 2026 but looks further ahead for population growth;
 - Guides development to the most sustainable locations;
 - Protects and enhances Fife's physical assets and resources;
 - Identifies how much land is needed for specific types of development;
 - Identifies the infrastructure and facilities required to support new development and the timing of their provision to implement new development;
 - Identifies likely sources of funding for infrastructure and facilities; and,
 - Provides a basis for Local Plan preparation and determining planning applications.
- 1.3 The Publicity and Consultation Statement contains a summary of every written comment received in respect of the Consultative Draft Fife Structure Plan and Fife Council's draft response to each comment. It also contains comments about the other documents that were made available for consultation in support of the Draft Structure Plan i.e. the Draft Report of Survey, Sustainability Appraisal and Draft Action Plan.

2. Statutory Requirements

- 2.1 The Town and Country Planning (Scotland) Act 1997, Section 8 (6) requires that when a Structure Plan is submitted to the First Minister for his consideration it must be accompanied by a statement containing details on how the obligations of the Act on publicity and consultation have been met.
- 2.2 This report sets out the process by which Fife Council has consulted during the preparation of the Fife Structure Plan.
- 2.3 Before finally determining the content of the Structure Plan for submission to the First Minister for approval, the planning authority must ensure that:
 - Adequate publicity is given to the report of survey and to matters it proposes to include in the plan;
 - All those likely to make representations on the plan are made aware of their right to do so:
 - Such persons are given adequate opportunity of making such representations; and.
 - All representations made within the prescribed period are considered by the planning authority.
- 2.4 The prescribed period in accordance with the Town and Country Planning (Structure and Local Plans) (Scotland) Regulations 1983, for making representations is not less than four weeks, specified by the planning authority at the time of publicity.
- 2.5 The Act and Regulations also require that, at the date of submission of a structure plan to the First Minister, notice shall be given by advertisement and the planning authority shall make copies of the Plan available for inspection at appropriate locations.

2.6 This Publicity and Consultation Statement has been produced to demonstrate the actions taken by Fife Council to comply with the requirements set out in the legislation.

3.0 How to Use the Publicity and Consultation Statement

- 3.1 The Draft Publicity and Consultation Statement index lists the names of who have submitted comments in response to Fife Matters and the associated documents that were the subject of the consultation exercise. Each submission has been allocated a unique reference.
- 3.2 For ease of use the submissions from each respondent have been grouped together. In most cases each response has been subdivided into a number of separate comments and each comment has been allocated a number. In order to assist the assessment of each comment they have been allocated to a topic heading and this shown in the responses. Each comment has been summarised and this Publicity and Consultation Statement sets out a response to each comment and a course of action, if any, to address the issue raised in the comment.

4. Statutory Consultation

4.1 Notice of Intention to Start Preparation of Structure Plan

At its meeting of 9th January 2003 Fife Council Policy and Resources Committee agreed the contents of a paper entitled "New Vision: A 20-Year Plan for Fife (2006 – 26) Strategic Choices for Sustainable Development."

4.2 Following this meeting the decision was taken to publish Fife Council's intention to prepare a replacement for the Fife Structure Plan 2002 to cover the whole of Fife. The formal notice was made by advertisement in local newspapers between 31st January and 12th February 2003 and in the Edinburgh Gazette on 31st January and 7th February 2003. The timescale for the plan was outlined in the advertisement. The Scottish Executive Development Department were formally notified about the Statement of Intent to Start preparation of the replacement of Fife Structure Plan in a letter dated 11th February 2003.

Notice of Preparation of Replacement of the Fife Structure Plan

- 4.3 At its meeting of 25th November 2004 Fife Council agreed to the approval of Fife Matters Consultative Draft 20 Year Structure Plan and to undertake public consultation on the Plan in 2005. The Draft Structure Plan was available on the web site for public inspection and downloading immediately prior to its approval by Fife Council on 25th November 2004.
- 4.4 Formal notices were published in the local newspapers and in the Edinburgh Gazette for two consecutive weeks between 4th March 2005 and 11th March 2005. The advertisement gave details of the documents which were the subject of the consultation exercise, of the locations where the documents could be inspected, how to purchase them in hard copy or CD-ROM versions and the location of the web site where copies could be examined and downloaded.
- 4.5 The formal public consultation exercise was preceded by a launch event which took place in the Town House, Kirkcaldy on the afternoon of Tuesday 1st March 2005, to which all Fife Councillors, Community Councils, Statutory Consultees, planning consultants, landowners, house builders, Housing Associations, trade organisations, infrastructure providers, higher education providers, and the press were invited.

5. Consultation Strategy

- 5.1 In order to secure the greatest amount of participation in the consultation exercise a strategy was drawn up. This ensured that consultees, especially those likely to require some time to consider their responses such as Community Councils and adjacent authorities, were informed of the progress and availability of documents as soon as possible.
- 5.2 The timetable for the approval process was agreed in September 2004 and in early October 2004 all Fife Community Councils were informed in writing of the proposed timetable and the intended publication dates for the documents.
- 5.3 The progress of the draft Structure Plan through the Committees was publicised by means of press releases that intimated the immediate availability of the approved version of the draft plan on the web site.
- 5.4 In December 2004 adjacent Local Authorities and those in the emerging City Region areas were informed of the availability of the documents on the web site in order to allow them a sufficient period of time to consider their responses.
- 5.5 The consultation strategy included a range mediums and included the use of local radio. From Monday 28th March to Friday 1st April 2005 a Kingdom Action week was featured on the Kingdom FM radio station and these were broadcast at 11.15am and 4.15pm each day. In the broadcasts a series of interviews were held about the plans and other documents out for consultation with the Head of Development Services, the Head of Transportation Services and other Managers.

6. Consultative Draft Fife Structure Plan Publications and Distribution

- 6.1 The Draft Structure Plan and associated documents were issued for public consultation as part of a wider consultation exercise involving both Development Services and Transportation Services. The Draft Structure Plan and the Local Transport Strategy were consulted upon on a Fife wide basis. Each of the three Areas were consulted upon their Area Transport Plans (East, West and Central Fife) whilst the draft St Andrews and East Fife Local Plan was also the subject of public consultation in East Fife.
- 6.2 The Structure Plan and associated documents issued for public consultation were:

Fife Matters – Consultative Draft Fife Structure Plan 2006 – 2026:

Draft Report of Survey:

Draft Action Plan; and,

Sustainability Appraisal.

6.3 In addition Development Services issued the following draft documents for public consultation:

Creating A Better Fife – Draft Urban Design Guide; Supplementary Guidance on Affordable Housing; and, Housing Market Areas.

6.4 Copies of the consultative Draft Structure Plan, together with the other documents listed above, either in hard copy and/or CD-ROM, were published and distributed during the first week in March 2005. The Plan and supporting documents were sent to:

Statutory Consultees MEPs, MPs and MSPs Fife Council Services Fife Partnership partners Community Councils

Tenants and residents associations

National interest groups

Neighbouring Local Authorities and all partner City Region Authorities

Scottish university libraries

Fife Council libraries

Fife Council locality offices

Fife Council local offices

Area Development Service offices

Equality networks

Fife Council elected members

Scottish Executive

Fife Secondary Schools

Persons and groups who requested copy in advance

- 6.5 Copies of a booklet, which provided a summary of the Draft Plan and supporting documents, entitled "Be A Part of Fife's Future" were sent to those receiving the consultation documents. It was also sent to other parties considered to be likely to have an interest in the consultation exercise including Planning Consultants, members of the Fife Construction Forum and a number of other persons / organisations who had requested to be informed of publication of the draft Structure Plan. The booklet was distributed throughout Fife in shops, libraries etc., together with posters.
- 6.6 Copies of all the documents and the "Be A Part of Fife's Future" were made available for inspection in all Fife Council Development Services planning offices, all Fife Libraries and all Fife Local Offices. The documents were also placed on the www.fifedirect.org.uk web site and copies could be downloaded and printed.

7. Consultation Period

7.1 The formal period for responses started on 7th March 2005 and was scheduled to end on 2nd May 2005. In the response to public concerns about the timescale for consultation, comments received up to the end of May were accepted as valid submissions.

8. Response Options

8.1 Respondents were requested to reply using pro-forma comments forms. These were available at all locations where the plan documents could be inspected and for download from the web site. Submissions by letter were also accepted. Respondents had the option of sending their comments to Fife Council via the mail system, or via fax, or in electronic form via email. Each comment was acknowledged in writing.

9. Public Meetings

- 9.1 Fife Council staged a number of public meetings during the consultation period as listed at 9.5 below. An additional meeting was held in Newport on Tay to ensure all those who attended the oversubscribed meeting on 12th April had the opportunity to take part. At all venues meetings were attended by Development Services' and Transportation Services' staff.
- 9.2 At each meeting staff from the two Services made short presentations and then responded to formal questions from the audience. For the remainder of the meeting the audience were given the opportunity to examine displays and copies of the documents and to obtain the answers to any points of detail or clarification of any issues of interest.

- 9.3 Details of the meeting dates and venues were advertised Fife wide and repeat advertisements were inserted in local newspapers in advance of each of the meetings. Posters advertising the meetings were displayed in the local area.
- 9.4 In addition to the public meetings Development Services staff attended meetings of a number of Community Councils to explain the plans and answer questions.
- 9.5 The venues and dates of the meetings and main topics discussed are listed below:

Inverkeithing 10th March (Attendance: 25)

Population growth; town centre regeneration; affordable housing; growth in commuting; employment needs for Fife; encouraging employers to Fife; and, public transport.

Dunfermline 15th March (Attendance: 65)

Population growth; housing need; town centre parking; Dunfermline Eastern Expansion; and health care facilities.

Kincardine 16th March (Attendance: 17)

Future employment opportunities; tenure of new housing; public transport; minerals trust fund; health care facilities; and water table.

Kelty 23rd March (Attendance: 13)

Population growth (increased number of commuters); status of Plan; Coastal Regeneration Zone; Kirkcaldy South West boundaries; public transport; Leven rail link; roads; and future employment opportunities.

Glenrothes 24th March (Attendance: 52)

Limited amount of references to action in Glenrothes in Plan; preference for promoting Kirkcaldy Town Centre over Glenrothes Town Centre; need for facilities in Glenrothes; concerns about A92; and local issues relevant to Markinch.

Kirkcaldy 29th March (Attendance: 43)

Location of SW Kirkcaldy SDA; details of coastal regeneration zone; station car parking; roads issues; balanced development (housing and employment land rather than housing for commuters); and Kirkcaldy harbour.

Lochgelly 30th March (Attendance: 21)

Population growth (in Lochgelly); affordable housing; traffic growth; Lochgelly Regeneration Project; public transport (access to Lochgelly Station); planning gain; and town centre improvements.

Levenmouth 6th April (Attendance: 40)

Accessibility issues including road network upgrades, and reinstatement of rail link.

Newburgh 7th April (Attendance: 67)

Plan strategy (concerns re sustainability); public transport; education facilities; affordable housing; and, increased local employment opportunities.

Newport 12th April (Attendance: 289*) Newport 25th April (Attendance: 140)

Plan strategy (concerns re base information and assumptions); population growth; housing land requirements; affordable housing; infrastructure capacity; education facilities (lack of capacity); employment land provision; green belt (for Tay Bridgehead); public transport (Wormit Station and bus services); Newport Park and Ride; and, potential of brownfield sites (use of sites in Dundee) and exhausted sand pits.

*A number of people did not register for first meeting and 115 people who failed to get in left contact details. The attendance at meeting on12th April was closer to 500. All who left contact details were advised, in writing, about the second meeting.

Leuchars 14th April (Attendance: 98)

Housing land requirements; roads (capacity of existing routes); infrastructure capacity; education facilities; and public transport.

Cupar 19th April (Attendance: 203)

Employment opportunities; employment land provision; housing land requirements; infrastructure capacity; consultation with landowners; public transport; St Andrews housing; and, Cupar bypass road.

St Andrews 20th April (Attendance: 341**)

Green Belt (failure to deliver promised Green Belt, apparent disregard of consultant's advice); roads (capacity of existing routes); population growth; housing land requirements; education facilities; population growth (questions about base assumptions, need for accurate student population numbers); plan strategy (growth proposals); and affordable housing.

**It is considered that the attendance figure is low as the hall was at its capacity of 500.

Anstruther 21st April (Attendance: 86)

Affordable housing; employment opportunities; roads (poor local network, capacity for new development); infrastructure capacity; planning gain; housing land requirement (assessment of need); and plan strategy (reasons for focus on Mid Fife).

10. Other Consultations

- 10.1 Meetings and discussions were held with Fife Council and external service providers and key partners during preparation of the Draft Plan. In finalising the Plan, further meetings have been held to discuss comments received about the contents of the Draft Plan.
- 10.2 Presentations on the Plan strategy were given to elected members, key partners, service providers and key national interest groups prior to the forthcoming finalisation of the Plan. Feedback from these meetings has been taken into account in finalising the Draft Plan.

11.0 Public Availability of Publicity and Consultations Statement

- 11.1 A draft version of the Publicity and Consultation Statement was made available for public inspection in paper format, in CD format and on the Fife Direct web site prior to and after the Environment and Development Committee of 17th November 2005.
- 11.2 A further revised version of the Publicity and Consultation Statement was made available on the Fife Direct web site prior to and after the Area Development Committees held in March 2006.

Index of Respondents

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ID	Respondent
0059	A H Smith, Per Messrs Raith Homes, Smith, A H - Greenloaning
0277	Adam, Roma - St Andrews
0198	Adamson, Laura - Tayport
0468	Adamson, Peter - St Andrews
0117	Aitken, Colin - Markinch, Glenrothes
0227	Alba Resource Recovery, Morin, K R - Gartlove, Alloa
0461	Anderson, Cecile - St Andrews
0364	Anderson, William B - St Andrews
0471	Anonymous,
0217	Association for the Protection of Rural Scotland, Wright, Bill - Edinburgh
0094	Association of Business in Cupar and District, Hair, James - Cupar
0039	ATH Resources, Weatherall, Lee - Doncaster
0509	Atisreal, Pearson, Euan - Edinburgh
0040	Atisreal, Per BAE Systems Ltd, Pearson, Euan - Edinburgh
0129	Auchtermuchty and Strathmiglo Community Council, Cowling, David -
	Gateside, Cupar
0286	Baird, Marianne - St Andrews
0436	Balsillie, Colin - St Andrews
0311	Barker, G H - St Andrews
0543	Barker, Mike - Dunfermline
0293	Barker, T C - St Andrews
0541	Barker, Thomas - Dunfermline
0339	Barkla, Martin - St Andrews
0315	Barrie, Carolyn - St Andrews
0476	Barrow, G W S - Edinburgh
0279	Baxter, Jean - St Andrews
0142	Baylis, Wendy - Wormit, Newport on Tay
0188	Birse, Ronald - Wormit, Newport on Tay
0550	Bisset, Pauline - Dunfermline
0089	Black, A B - Dairsie, Cupar
0396	Black, E - St Andrews
8800	Black, Patricia - Dairsie, Cupar
0151	Blair, Andrew - Wormit, Newport on Tay
0044	Bloomfields Ltd, Per General Aviation Awareness Council, Bloomfield, Anna - Maidstone
0127	Boarhills and Dunino Community Council, Raeside, Stuart - Dunino, St Andrews
0345	Bowie, J - St Andrews

ID	Respondent
0095	Bowman, Eric - Strathkinness, St Andrews
0427	Bowman, Eric - Strathkinness, St Andrews
0376	Boyd, Deirdre - St Andrews
0605	Brett Tim - Cupar
0230	British Aggregates Association, Bird, Richard - Doune
0222	British Wind Energy Association, Addersley, Kattie - London
0208	Brocklebank, Ted - Edinburgh
0207	Brown, Gordon - Cowdenbeath
0152	Brown, M M - Wormit, Newport on Tay
0380	Bullough, Alice
0599	Burgh of St Monans Community Council, Whitome, Ben - St Monans, Anstruther
0516	Butler, Frank - St Andrews
0322	Byrne, Jennifer - St Andrews
0319	Byrne, Richard W - St Andrews
0272	Cameron, Moira - St Andrews
0186	Campbell, Bill - Tayport
0171	Campbell, David - Newport on Tay
0462	Campbell, Morag - St Andrews
0183	Campbell, Robert - Wormit, Newport on Tay
0128	Carnbee and Arncroach Community Council, Lodge, Janet - Carnbee, Anstruther
0490	Castellucci, Paul - Springfield, Cupar
0138	Central Dunfermline Community Council, Evans, Valerie - Dunfermline
0416	Central St Andrews Residents Alliance, Middleton, David - St Andrews
0553	Chalmers, John - Dunfermline
0261	Chapman, Roy De C C - St Andrews
0325	Chapman, V K - St Andrews
0260	Chapman, Valerie - St Andrews
0139	Charlestown, Limekilns and Pattiesmuir Community Council, Hamilton, Sue - Limekilns, Dunfermline
0466	Christie, A - St Andrews
0374	Christie, Vicky - St Andrews
0503	Clackmannanshire Council, Urquhart, Niall - Alloa
0145	Clark, A - Tayport
0275	Clark, C - St Andrews
0301	Clements, Anna - St Andrews
0366	Clements, Tony - St Andrews

ID 0185 0333 0074	Respondent Clift, Ben - Wormit, Newport on Tay Collier Cameron, Andrew - St Andrews Colliers CRE, Per Owners Inverteil & Tyrie Farms, Drummond, Martin
0212 0520 0225 0530 0251 0343 0316 0114	Edinburgh Communities Scotland, Lang, Elspeth - Edinburgh Condie, Alex Confederation of UK Coal Producers, Brewer, David - Wakefield Cook, Dennis J - Dunfermline Cordner, M C - St Andrews Cormack, Edith - St Andrews Cormack, Richard - St Andrews Cousins, Isabella - Oakley, Dunfermline
0469 0359 0431 0528 0480 0157 0150 0135 0383 0552 0305 0137	Cowan, JB - St Andrews Craik, Alan D D - St Andrews Craik, E M - St Andrews Craik, Lindsay - Crossford, Dunfermline Crichton, R F - St Andrews Crockhart, David - Wormit, Newport on Tay Crockhart, V - Wormit, Newport on Tay Crossford Community Council, Hay, Doug - Crossford, Dunfermline Cubbage, George - St Andrews Cunningham, Adam - Glenrothes Cunninghan & Ms E Fryer, J - St Andrews Dalgety Bay Community Council, Chorleys, Stephen - Dalgety Bay, Dunfermline
0508 0182 0488 0257 0256 0487 0244 0523 0062	Dalgleish Associates Ltd, Per Enstone Thistle Ltd, Dalgleish, Karen - Dunblane Dallas-Ross, Sarah - Newport on Tay Dalrymple, Irene - Springfield, Cupar Davidson, Anne - St Andrews Davidson, Duncan - St Andrews Dawson, Carol - Springfield, Cupar de Vries, Gordon - St Andrews Dean, Peter N - North Queensferry, Inverkeithing Deanway Development Limited, Edinburgh

ID	Respondent
0144	Dear, Douglas - Tayport
0444	Dearle, Fiona - St Andrews
0060	Derek Scott Planning, Per Wilson Homes Limited, Scott, Derek - Edinburgh
0408	Dickens, M - St Andrews
0568	Dickson, Jean - St Andrews
0446	Dickson, Robert - St Andrews
0046	DKA Planning, Pollock, Allan - Kirkcaldy
0045	DKA Planning, Per Fieldwork Contracts Ltd, Pollock, Allan - Kirkcaldy
0289	Docherty, J T - St Andrews
0292	Docherty, P R - St Andrews
0397	Donald, E - St Andrews
0358	Donald, Iain - St Andrews
0363	Donaldson, Caroline - Dundee
0347	Donaldson, Neil - St Andrews
0372	Donaldson, Valerie - St Andrews
0514	Douglas, F - Wormit, Newport on Tay
0085	Douglas, Peter - Newburgh, Cupar
0429	Douglas, V L T - St Andrews
0283	Dowie, Joan - St Andrews
0100	Downie, Thomas - St Andrews
0421	Dr C Jones & Ms K McSladdy, - Boarhills, St Andrews
0021	Drivers Jonas, Wood, Alastair - Glasgow
0048	DTZ Pieda Consulting, Per CIS Ltd, Fraser, Callum - Edinburgh
0034	DTZ Pieda Consulting, Per Kingslaw Park Limited, Sorrell, Jim - Edinburgh
0120	Dumbreck, J - Dysart, Kirkcaldy
0500	Dundee City Council,
0107	Dunfermline City Centre Business Forum, Sullivan, William - Dunfermline
0558	Duthie, E - Dunfermline
0165	Dykes, Andrew - Tayport
0191	Dykes, Andrew - Tayport
0206	Dykes, Samantha - Tayport
0331	Edwards, A S - St Andrews
0125	Elie and Earlsferry Community Council, Lamond, William - Elie, Leven
0073	EMA Architecture & Design, Per Thomas Mitchell Group, McIntyre, Ewan - Edinburgh
0223	EnergieKonter UK Ltd, McLoughlin, Mick - Bond End, Knaresbrough

ID	Respondent
0097	Evans, Alan - Newburgh, Cupar
0078	Evans, David - Upper Largo, Leven
0478	Eynon, Mary - St Andrews
0334	Falconer, Kenneth - St Andrews
0130	Falkland and Newton Community Council, Garrett, Anthony - Falkland, Cupar
0017	Farningham McCreadie Partnership, Per Abercorn Estates, Plant, Joanne Edinburgh
0020	Farningham McCreadie Partnership, Per Muir Group, Farningham, Alan - Edinburgh
0018	Farningham McCreadie Partnership, Per Royal Mail Group PLC, Plant, Joanne - Edinburgh
0019	Farningham McCreadie Partnership, Per The Old Course Limited, Plant, Joanne - Edinburgh
0569	Field, Christopher - St Andrews
0362	Field, Elizabeth Ann - St Andrews
0507	Fife Constabulary, Mellor, David - Glenrothes
0510	Fife RIGS Group, Browne, Mike - Edinburgh
0406	Finlay, D - St Andrews
0410	Finlay, D - St Andrews
0384	Finlay, Janet - St Andrews
0405	Finlay, Scott - St Andrews
0537	Flanagan, Roy - Dunfermline
0273	Fontes, Sheila - St Andrews
0274	Fontes, Stephen - St Andrews
0527	Forbes, Gilbert - Glenrothes
0214	Forestry Commission Scotland - Central Scotland, Blackburn, Trevor - Clydebank
0539	Forrester, D - Dunfermline
0571	Forrester, J W Ewing - St Andrews
0403	Foster, Frances M - St Andrews
0563	Fotheringham, Jacquie - Dunfermline
0348	Fraser, K C - St Andrews
0202	Fraser, Kerri - Tayport
0330	Fraser, P J - St Andrews
0205	Gaffney, Jess - Tayport
0443	Gallon, E
0192	Gallon, John

ID	Respondent
0253	Glenderran Guest House Ltd, Pead, - St Andrews
0047	GLHearn, Per The Co-operative Group Property Division, Jackson, Ruairidh - Glasgow
0559	Gold, Iain - Dunfermline
0546	Gordon, Andrew - Dunfermline
0180	Gordon, Ian - Tayport
0042	Graham Sinclair Associates, Per Pitardo Development Co. Ltd, - Broughty Ferry, Dundee
0061	Gray Construction Ltd, Gray, David - Edinburgh
0176	Gray, B T - Tayport
0492	Green, Isabel - Springfield, Cupar
0288	Grinyer, Peter - St Andrews
0573	Grounds, B J - St Andrews
0437	Grounds, DW - St Andrews
0483	Guy, R N - Springfield, Cupar
0035	GVA Grimley, Per Ominvale Limited (Wellwood), McCafferty, Andrew - Edinburgh
0036	GVA Grimley, Per Omnivale Limited (Lochgelly), McCafferty, Andrew - Edinburgh
0572	GVA Grimley, per Strawsons Property, McCafferty, Andrew - Edinburgh
0224	H J Banks & Company Limited, Hancock, Justin - Tow Law
0028	Halliday Fraser Munro, Per Headon Developments Limited (Guardbridge), Stewart, Nicola - Edinburgh
0027	Halliday Fraser Munro, Per Headon Developments Limited (Cupar), Stewart, Nicola - Edinburgh
0456	Halliday, Elspet - St Andrews
0294	Hannah, Margaret - St Andrews
0404	Hardie, P A - St Andrews
0422	Harding, Judith - St Andrews
0002	Hargest & Wallace, Per Hammerson PLC, Hargest, Keith - Edinburgh
0001	Hargest & Wallace, Per Robertson Homes Limited, Wallace, Bryan - Edinburgh
0147	Harkins, William - Wormit, Newport on Tay
0548	Harmack, H - Dunfermline
0555	Harris, Claire - Dunfermline
0285	Harris, Deborah - St Andrews
0200	Harris, Fraser - Tayport
0452	Hart, RM - St Andrews
0116	Harwood, J - Cupar
0080	Henderson, David - Kirkcaldy

ID	Respondent
0313	Herbert, M - St Andrews
0401	Hill, Susan - St Andrews
0575	Hipwell, Mary - Dunfermline
0385	Hirst, D - St Andrews
0594	Hirst, L - St Andrews
0551	Hirst, L - St Andrews
0482	Hodge, J.L St Andrews
0557	Hodkinson, P Dunfermline
0213	Homes for Scotland, Melville, Blair - Edinburgh
0454	Hope Park Residents Association, Quinault, Frank - St Andrews
0371	Hopgood, A M - Blebo Craigs, Cupar
0518	Hopgood, J A - Blebo Craigs, Cupar
0591	Hopper, L D R - St Andrews
0354	Hopper, Lorraine - St Andrews
0203	Hughes, Ailsa - Tayport
0106	Hume, Ian - Gowkhall, Dunfermline
0459	Humphries, Alan & Catherine - St Andrews
0399	Humphries, Frances N C - St Andrews
0465	Hunter, Joan - London
0475	Hunter, John - St Andrews
0521	Hutchison, Robert - Glenrothes
0043	Iain Gotts Associates, Per J W Muir Group, Gotts, Iain - Edinburgh
0302	Illingworth, G - St Andrews
0067	Ironside Farrar Ltd, Per I & H Brown Limited, - Edinburgh
0054	James Barr, Per Landteam Scotland (Glenrothes) Ltd, Mitchell, Alex - Glasgow
0056	James Barr, Per Messrs Allister (Crossgates), Mitchell, Alex - Glasgow
0055	James Barr, Per Messrs Allister (Halbeath), Mitchell, Alex - Glasgow
0053	James Barr, Per Palisade Properties, Mitchell, Alex - Glasgow
0052	James Barr, Per Tullis Russell, Mitchell, Alex - Glasgow
0081	Jardine, Ewen - Freuchie, Cupar
0075	Jarvie, Jim - Dunfermline
0003	Jenkins & Marr, Per Bett Homes, Roberts, Andrew - Edinburgh
0004	Jenkins & Marr, Per BP Exploration Company Ltd, Roberts, Andrew - Edinburgh
0005	Jenkins & Marr, Per Scarborough Development Group, Handley, John - Edinburgh

ID	Respondent
0071	John Handley, Handley, John - Edinburgh
0175	Johnson, N - Wormit, Newport on Tay
0026	Jones Lang LaSalle, Per Grosvener Developments, Hogg, Jason - Edinburgh
0025	Jones Lang LaSalle, Per The Woodford Group, Bell, David - Edinburgh
0545	Jones, W - Dunfermline
0204	Jordan, Sean - Tayport
0266	Joy, Frances - St Andrews
0267	Joy, Michael - St Andrews
0328	Kay, Martin - St Andrews
0113	Kelly, James - By Blairhall, Dunfermline
0164	Kennedy, Elizabeth - Wormit, Newport on Tay
0134	Kennoway Community Council, Simpson, Alison - Bonnybank, Leven
0049	Keppie, Per Albany Commercial Services, MacCallum, Gordon - Glasgow
0050	Keppie, Per Cala Homes, MacCallum, Gordon - Glasgow
0051	Keppie, Per Inverkeithing Bay Renewal, MacCallum, Gordon - Glasgow
0598	Kilmany and Logie Community Council, McNeely, T - Balmerino, Newport on Tay
0162	Kilmister, Sally - Tayport
0417	Kilmister, Sally - Tayport
0506	Kinghorn Community Council, McLeod, John - Kinghorn
0549	Kingshott, M - Dunfermline
0375	Kinloch, - St Andrews
0511	Kirkcaldy Civic Society, Hall, Mary - Kirkcaldy
0400	Kirkwood, Thomas D C - St Andrews
0104	Kuehn, R - Blairhall, Dunfermline
0547	Kyle, Sarah - Dunfermline
0451	Laidler, E.W Strathkinness, St Andrews
0524	Lambert, Robert - Glenrothes
0133	Largo Area Community Council, Marshall, Jill - Upper Largo, Leven
0544	Lawson, Elizabeth - Dunfermline
0105	Leatherland, Beryl - Limekilns, Dunfermline
0379	Ledder, J - St Andrews
0450	Lee, Terence R - St Andrews
0310	Lightwood, Anne - St Andrews
0391	Lillie, N - St Andrews
0493	Lindsay, J - Springfield, Cupar

ID	Respondent
0370	Lindsey, John
0579	Logan, Gordon - Newport on Tay
0525	Loveday, Karen A Dalgety Bay, Dunfermline
0341	Lowe, Sandra - St Andrews
0295	Lunan, Nick - Kingsbarns, St Andrews
0382	Lydvo, J Sheila - St Andrews
0201	MacDonald, Jamie - Tayport
0280	MacGregor, D F - St Andrews
0368	MacGregor, James W E - St Andrews
0276	MacGregor, Kim - St Andrews
0457	Mackenzie, J S - St Andrews
0489	MacNaughton, K - Springfield, Cupar
0554	Major, R - Dunfermline
0118	Manson, Bruce - Markinch, Glenrothes
0068	Mappin Planning and Development, Per Hutcheson Family (Spencerfield Farm), Mappin, Gary - Glasgow
0505	Markinch Community Council, Morton, John - Markinch, Glenrothes
0119	Markinch Heritage Group, McKnight, Rachael - Glenrothes
0237	Marks, Averill - St Andrews
0236	Marks, Patrick - St Andrews
0115	Martin, Ross - Larbert
0195	Mason, Rebecca - Tayport
0076	Mathers, lan - Tayport
0247	Mathewson, Ken - St Andrews
0102	Mathieson, David - Newburgh, Cupar
0467	McAdam-Smith, Alison - St Andrews
0430	McAllister, Colin - St Andrews
0394	McCall, M F - St Andrews
0296	McCallum, D - St Andrews
0533	McCran, Brian - Dunfermline
0534	McCran, E.S Dunfermline
0532	McCran, Marcus - Dunfermline
0531	McCran, Paul J B - Dunfermline
0099	McGavin, K S - Cupar
0079	McIver, Iain - St Andrews
0409	McIver, Joyce - St Andrews

ID	Respondent
0181	McLaren, Gordon - Wormit, Newport on Tay
0153	McLaren, M - Wormit, Newport on Tay
0168	McLaren, R - Wormit, Newport on Tay
0542	McLean, Colin - Dunfermline
0438	McLean, Neil - St Andrews
0561	McLean, Robin - Dunfermline
0110	McLellan, Andrew - Dunfermline
0449	McMullan, E - Boarhills, St Andrews
0086	Melville, Frances - Cuparmuir, Cupar
0246	Millar, M A - St Andrews
0304	Milne, Alec - St Andrews
0132	Milton and Coaltown of Balgonie Community Council, Ritchie, Peter - Coaltown of Balgonie, Glenrothes
0349	Mitchell, Cathy - Dundee
0298	Mitchell, Colin - St Andrews
0426	Mitchell, Malcolm M - St Andrews
0491	Mitchell, Valerie - Springfield, Cupar
0023	Montagu Evans, Per CRE Energy Ltd, Sidgwick, Alison - Edinburgh
0022	Montagu Evans, Per Grampian Country Food Group Limited, Sidgwick, Alison - Edinburgh
0336	Montford, Angela - St Andrews
0323	Montford, G T - St Andrews
0012	Montgomery Forgan Associates, Per A & J Stephen Ltd, Maclean, Emelda Cupar
0015	Montgomery Forgan Associates, Per David I Robertson (Farms) Ltd, Maclean, Emelda - Cupar
0014	Montgomery Forgan Associates, Per Mr I Spowart, Maclean, Emelda - Cupar
0013	Montgomery Forgan Associates, Per St Andrews Western Development Consortium, Maclean, Emelda - Cupar
0016	Montgomery Forgan Associates, Per The Skene Group, Maclean, Emelda Cupar
0011	Montgomery Forgan Associates, Per Various Clients, Maclean, Emelda - Cupar
0101	Mordi, Loretta - Cupar
0522	Morton, John - Markinch, Glenrothes
0407	Morton, William - St Andrews
0179	Moulds, Alan - Wormit, Newport on Tay
0177	Moulds, Caroline - Wormit, Newport on Tay
0178	Moulds, Jacqueline - Wormit, Newport on Tay

ID	Respondent
0070	Mount Melville Limited, Younger, Michael - Edinburgh
0538	Moyes, P Dunfermline
0445	Mudie, A M - Strathkinness, St Andrews
0424	Mudie, E J - Strathkinness, St Andrews
0038	Muir Smith Evans, Per Balgonie Estates Ltd, Evans, Robert - Edinburgh
0037	Muir Smith Evans, Per Holland Park, Evans, Robert - Edinburgh
0314	Mullan, W N B - St Andrews
0352	Mundie, Douglas S - St Andrews
0258	Murphy, Lyn - St Andrews
0259	Murphy, Ronald - St Andrews
0540	Murray, Janet - Dunfermline
0463	Murray, M - St Andrews
0240	Murray, Margaret - St Andrews
0241	Murray, Robert - St Andrews
0290	Napier, Robert - St Andrews
0029	Nathaniel Litchfield and Partners, Per George Wimpey David Wilson Homes Thomas Mitchell, Hepburn, Michael - Newcastle Upon Tyne
0173	Neilson, I - Wormit, Newport on Tay
0190	Newport Primary School Board, Laird, Callum - Newport on Tay
0220	NFU Fife Area, Picken, John - St Andrews
0602	NHS Fife, Adamson, Cathy - Kirkcaldy
0308	Nicoll, M D - St Andrews
0361	Nimmo, Irene - St Andrews
0593	Nimmo, Irene - St Andrews
0131	North Glenrothes Community Council, Page, Ron - Glenrothes
0163	O'Neill, Basil - Wormit, Newport on Tay
0058	Oatridge Ltd, Johnston, Charles - Edinburgh
0309	Oberlanders Architects, Lawson, David - Edinburgh
0242	Oliver, Richard - St Andrews
0243	Oliver, Susan - St Andrews
0211	Ore Valley Housing Association, Summers, Andrew - Cardenden, Lochgelly
0149	Osmon, G - Newport on Tay
0281	Outram, Anne - St Andrews
0184	Paterson, R - Wormit, Newport on Tay
0495	Paton, Yvonne - Springfield, Cupar
0090	Pay, Gordon - Cupar
0567	Pay, Gordon - Cupar
0501	Perth & Kinross Council, Bean, Roland - Perth

ID	Respondent
0187	Petrie, J M - Wormit, Newport on Tay
0414	Phillips, Carol-Ann - St Andrews
0513	Phimister, Donald G - St Andrews
0344	Picken, John - St Andrews
0263	Picton, E. M St Andrews
0262	Picton, J. D St Andrews
0326	Pollmann, Karla - St Andrews
0287	Poole, Julie - St Andrews
0306	Poole, Julie - St Andrews
0317	Powell, Brian - St Andrews
0064	PPCA Ltd, Per Graham Barnet, Allan, Peter - Edinburgh
0300	Price, MLC - St Andrews
0481	Priest, Eric & Clare - St Andrews
0066	Pritchett Planning Consultancy Ltd, Per Tesco Stores Ltd, Pritchett, Phil - Edinburgh
0346	Purvis, Louise S D - St Andrews
0231	Quarry Products Association, Sheridan, John - Glasgow
0447	Quinault, Francis C - St Andrews
0337	Quinault, Wendy - St Andrews
0238	Quinn, Elizabeth - St Andrews
0580	R&G Homes, Young, Gordon - Kirknewton
0121	Rab Hutton, Per Mr E McPherson, Hutton, Robert - Limekilns, Dunfermline
0442	Rae, Cameron - St Andrews
0210	Rail Passengers Committee Scotland, Samson, Robert - Glasgow
0448	Ramsay, Monica - St Andrews
0108	Reid, Peter - Dunfermline
0497	Richmond, Laurina - Dairsie, Cupar
0158	Richmond, Mary - Wormit, Newport on Tay
0199	Ricketts, David - Tayport
0365	Riddell, Joan - St Andrews
0069	Ritchie Dagen + Allan, Per Torith + Drumoig Ltd, Dagen, Joseph - Dundee
0232	RMC Materials Ltd, O'Sullivan, J. M Thorpe, Egham
0161	Roberts, Andrew - Tayport
0248	Roberts-Jones, Maria & Dell - St Andrews
0082	Robertson, Alastair - St Andrews

ID	Respondent
0087	Robertson, Alastair - St Andrews
0320	Robertson, Alicia - St Andrews
0297	Robertson, David - St Andrews
0560	Robertson, Derek - Dunfermline
0420	Robertson, M - St Andrews
0268	Robertson, Patricia - St Andrews
0269	Robertson, Sarah-Ellen - St Andrews
0369	Roger, Jo - St Andrews
0170	Romilly, Sally - Newport on Tay
0434	Room, Frances M H - St Andrews
0433	Room, Stan D - St Andrews
0174	Ross, Birgit - Wormit, Newport on Tay
0472	Rowlands, R - St Andrews
0103	Royal Air Force Leuchars, Perry, K W - Leuchars, St Andrews
0126	Royal Burgh of Cupar & District Community Council, Drummond, Gavin Cupar
0123	Royal Burgh of St Andrews Community Council, Goudie, Ian - St Andrews
0031	RPS, Per Henderson Surveyors, Salter, Bob - Leith, Edinburgh
0032	RPS, Per Ogilvie Homes Bett Homes, Neaves, Philip - Leith, Edinburgh
0033	RPS, Per Taylor Woodrow, Salter, Bob - Leith, Edinburgh
0215	RSPB Scotland, Finney, Suki - Perth
0473	Rushworth, A J - St Andrews
0494	Russell, Lorna - Springfield, Cupar
0425	Ryan, Bruce M - St Andrews
0386	Samuel, Vanessa
0595	Sangster, William - Strathkinness, St Andrews
0093	Saunders, C - St Andrews
0435	Saunders, C - St Andrews
0156	Sawyer, Jean - Newport on Tay
0517	Scobie, David - Kirkcaldy
0228	Scottish Coal, Beebe, Stephen - Gartlove, Alloa
0229	Scottish Coal, Ortlep, Colin - Gartlove, Alloa
0499	Scottish Enterprise Fife, Johnston, Willie - Glenrothes
0219	Scottish Environment Protection Agency, Caswell, Sean - Perth
0498	Scottish Executive Development Department, Jobling, Ken - Edinburgh
0209	Scottish Natural Heritage, Leys, Katherine - Cupar

ID	Respondent
0604	Scottish Water Glasgow
0216	Scottish Wildlife Trust, Blow, Stephen - Edinburgh
0504	SEERAD, Marshall, Lynda - Edinburgh
0515	Selwyn, F - St Andrews
0350	Selwyn, Flora - St Andrews
0455	Seth, D R - St Andrews
0485	Seymour, M J D - Springfield, Cupar
0484	Seymour, P H K - Springfield, Cupar
0111	Simpson, James - Dunfermline
0357	Sinclair, Bruce - Strathkinness, St Andrews
0474	Slim, Ann - St Andrews
0592	Smith, Dorothy - St Andrews
0393	Smith, Eric M - St Andrews
0234	Smith, Graham - St Andrews
0291	Smith, Kenneth - St Andrews
0169	Smith, Terry - Wormit, Newport on Tay
0512	South West Dunfermline Amenity Improvement Group, Neilson, Rona - Dunfermline
0428	Spackman, Anna - St Andrews
0084	Spackman, S G F - St Andrews
0411	Speir, M - St Andrews
0519	Sprent, J I - Wormit, Newport on Tay
0284	Sprot, Ralph & Celia - Peat Inn, Cupar
0377	St Andrews Bay, Carter, Stephen - St Andrews
0390	St Andrews Green Belt Forum, Jackson, A A - St Andrews
0245	St Andrews Hotel & Guesthouse Association, Knox, W - St Andrews
0453	St Andrews Links Trust, Mason, Peter - St Andrews
0398	St Andrews Merchants' Association, Inch, Robert - St Andrews
0389	St Andrews Preservation Trust Limited, Morrison, Dorothea - St Andrews
0392	Stapleton, J R - St Andrews
0312	Stemple, David - St Andrews
0254	Stephens, A. C St Andrews
0255	Stephens, W G S - St Andrews
0282	Stephenson, - St Andrews
0109	Stephenson, Chris - Dunfermline
0098	Stevenson, Fionn - Tayport
0063	Stewart Milne Homes, McGowan, Marianne - Weshill, Aberdeen
0402	Stewart, Ilene - St Andrews

ID	Respondent
0299	Stewart, John - St Andrews
0303	Stewart, Mr D R & Dr J M - St Andrews
0235	Stinzy, Frederique - St Andrews
0024	Stirling Developments, Stirling, Peter - Edinburgh
0477	Storey, F D - St Andrews
0340	Stother, Jacqueline - St Andrews
0265	Strachan, Archibald - St Andrews
0264	Strachan, Eleanor - St Andrews
0092	Strachan, Paul - Tayport
0351	Streatfield-Jones, - St Andrews
0006	Strutt & Parker, Per Broadland Properties Limited, Lynch, Sinead - Edinburgh
0010	Strutt & Parker, Per Mr & Mrs I F Crombie, Lynch, Sinead - Edinburgh
0007	Strutt & Parker, Per Mr A Miller (Kellie Castle Farm), Lynch, Sinead - Edinburgh
0009	Strutt & Parker, Per Raith Estate, Kirkcaldy, Lynch, Sinead - Edinburgh
8000	Strutt & Parker, Per The Balcarres Estate, Fife, Lynch, Sinead - Edinburgh
0112	Suttie, W - Steelend, Dunfermline
0419	Swankie, Ian - St Andrews
0041	T G Packe, Per Logie and Pittencrieff Estate, Packe, T G - Linlithgow
0387	Taylor, - St Andrews
0413	Taylor, A - St Andrews
0140	Taylor, Margaret - Tayport
0395	Taylor, Nan - St Andrews
0122	Tayport Community Council, Massie, Jean - Tayport
0166	Tayport Local Plan Action Group, Stevenson, Fionn - Tayport
0353	Thain, Eric - St Andrews
0030	The Barton Willmore Planning Partnership, Per Boyack Homes, Clarke, Phillip - Edinburgh
0124	The Burgh of Ladybank and District Community Council, Croll, David - Ladybank, Cupar
0502	The City of Edinburgh Council, Hall, Stephen - Edinburgh
0226	The Coal Authority, Pickup, Kevin - Mansfield
0057	The Development Planning Partnership, Per Halladale Developments Ltd, Innes, David - Glasgow
0249	The Dunvegan Hotel Ltd, Willougby, Jack - St Andrews
0600	The East Neuk of Fife Preservation Society, Beaton, John - Elie,
0250	The Inn On North Street Hotel, Knox, W - St Andrews

ID	Respondent
0218	The Lauder Group, Lowe, Janet - Dunfermline
0252	The Pilmour Hotel, St Andrews
0072	The Planning Bureau Limited, Per McCarthy & Stone (Developments) Ltd, Thompson, Philip - Bournemouth
0154	Thompson, S - Tayport
0159	Thompson, S - Tayport
0439	Thorsen, Susanne - St Andrews
0332	Thorsen, Susanne - St Andrews
0479	Tombs, Dorothy - St Andrews
0136	Touch and Garvock Community Council, Reid, Peter - Dunfermline
0196	Towns, Amy - Tayport
0432	Turner, Henry R - St Andrews
0470	Tynte-Irvine, Anne - St Andrews
0536	Udall, Robert D - Dunfermline
0415	University of St Andrews, Principal's Office, Watson, Derek A - St Andrews
0360	Uprichard, P M - St Andrews
0083	Valantine, Gilbert - Wormit, Newport on Tay
0356	Vernon, Michael - St Andrews
0355	Vincent, Fiona - St Andrews
0578	Vivarium, Patullo, Anne - Falkland, Cupar
0160	Wainman, Anna - Tayport
0167	Wake, John - Tayport
0197	Wallace, Madison - Tayport
0526	Ward, Corrie - Ladybank, Cupar
0065	Warren Consultants Ltd, Per UK Coal Ltd, Cameron, Steven - Milngavie, Glasgow
0077	Watchman, John - St Andrews
0367	Waterston, Robin - St Andrews
0556	Watret, D - Dunfermline
0566	Watt, Maureen - Lochgelly
0233	WBB Minerals, Horsley, Nick - Sandbach
0141	Weir, G - St Andrews
0412	Weir, Gregory - St Andrews
0270	Weir, Mike - St Andrews
0318	Weir, Tim - St Andrews
0271	Weir, Valerie - St Andrews
0603	West Villages Community Forum Crane John - Saline Dunfermline
0496	Westcott, J - Dairsie, Cupar
0535	Westwater, Michael - Glenrothes

ID	Respondent
0148	White, John & Audrey - Tayport
0221	Whitehead, Marilyn - Leven
0562	Whitehead, Marilyn - Leven
0460	Wigmore, Peter & Sheila - St Andrews
0342	Wilkes, Sharon J - St Andrews
0338	Williams, John & Elizabeth - St Andrews
0189	Willis, R G - Tayport
0373	Willsher, E C - St Andrews
0146	Wilson, A W - Tayport
0239	Wilson, Danielle - St Andrews
0329	Wilson, Douglas - St Andrews
0378	Wilson, E A - St Andrews
0278	Wilson, Johnathan & Margaret - St Andrews
0327	Wishart, Brian J - St Andrews
0091	Witham, Miles - Wormit, Newport on Tay
0388	Wood, Chris - St Andrews
0464	Wowk, Karen - St Andrews
0307	Yarr, Roddy - St Andrews
0321	Young, Jean - St Andrews
0143	Zomerdijk, Joost - Wormit, Newport on Tay

ID 0001

Hargest & Wallace, Per Robertson Homes Limited, Wallace, Bryan - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Welcomes Draft Plan's recognition of the potential of St Andrews as a world class destination.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Partly welcomes the identification of St Andrews as Medium Scale Growth Area. However, considers there is further scope for growth in St Andrews and East Fife and in particular in St Andrews which should be identified as a Strategic Development Area.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received, balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Urban Capacity Study

Comment:

Study fails to identify land at Abbey Walk, St Leonards, St Andrews.

Response:

There is a site identified in the St Andrews & East Fife Draft Local Plan (ref h 78 St Leonards, St Andrews) which has been included in the 2005 Urban Capacity Study. It was not included in the 2004 Urban Capacity Study as the cut off date for the inclusion of a site in that study was 31st March 2004 at which time the St Andrews & East Fife Draft Local Plan had not been completed. The Structure Plan is not site specific.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

MSHA for St Andrews gives too great a range between minimum and maximum and lacks clarity. Requests that the range be narrowed to 1600-1800 to reduce uncertainty and ensure sufficient housing land is allocated. Furthermore, in order to recognise the development potential of St Andrews, this should be acknowledged by receiving Strategic Area Status and the figures increased to a range of 2000-2200 dwellings.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Policy DC1 does not accord with national guidance and developers cannot be made responsible for existing shortfalls.

Response:

Policy DC1 is related to new development. Whilst developers are unlikely to be asked to address existing shortfalls they may be required to make an appropriate contribution to shortfalls generated by new development.

Action:

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Action Plan

Subject: Developer Contributions

Comment:

Action Plan very generalised in nature. No costs supplied. Relies heavily on developer contributions. Action Plan omits spending programmes for public bodies in Fife despite the fact that public expenditure accounts for 54% of Scotland's GNP.

Response:

Action Plan must be revised every two years and more detailed costs will emerge as greater detail is obtained. Public expenditure programmes tend not to be long term.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Travel Plans do not necessarily have to be dealt with by a Section 75 Agreement.

Response:

The Section 75 Agreement, which can bind initial and successive recipients of planning permission, is the best mechanism to secure a long-term commitment to travel plans.

Action:

No Change

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Brownfield Land

Comment:

Glossary definition of brownfield site should accord with that in SPP3. The Affordable Housing definition follows SPP3 and the Brownfield definition should similarly accord.

Response:

Disagree. Definition in Finalised Structure Plan Glossary is broad, covers a wide range of situations and is consistent with the existing approved Fife Structure Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Brownfield Land

Comment:

The Sustainability Appraisal should give enhanced status to brownfield developments and those in urban centres.

Response:

Strategy prioritises use of brownfield sites particularly those sites within urban areas, however proposals for use of these sites must be consistent with the Development Plan. The Sustainability Appraisal methodology does not give enhanced status to any sites. The Appraisal assesses all policies and proposals against a range of sustainability criterion.

Action:

No Change

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Draft Plan Policy H5 fails to recognise the role of the market in delivering affordable houses as per the glossary definition.

Response:

Disagree. The Housing Needs and Affordability Study, which informs the Finalised Structure Plan policy, has taken into account the role of the market in meeting the need for affordable housing. Draft Plan Policy H5 now Finalised Plan Policy H4.

Action:

No Change

Comment No: 12

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Draft Plan Policy H5 does not follow the Local Housing Needs and Affordability model for Scotland (Professor Bramley's model).

Response:

Finalised Plan Policy H4 (Draft Plan Policy H5) is informed by the Fife Housing Needs and Affordability Study, which is broadly consistent with DETR Guidance. Communities Scotland was closely involved with the Study and raised no significant concerns. The Bramley model was designed for a different purpose; to provide a framework for strategic investment. It was never envisaged as providing local needs information.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Draft Plan Policy H5 does not make provision for student accommodation despite the need in St Andrews.

Response:

The updated Housing Needs and Affordability Study, upon which Finalised Plan Policy H4 (Draft Plan Policy H5) is based, did take account of the influence of the University in St Andrews.

Action:

No Change

Comment No: 14

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

There is little consistency between the Local Housing Strategy and the Development Plan, not least because the Policy has been developed before the Housing Needs Assessment became available.

Response:

Affordable housing is a dynamic issue. The Finalised Structure Plan has been informed by the updated Housing Needs and Affordability Study, the public consultation and PAN 74 which was published after the Consultative Draft Structure Plan was approved.

Action:

Amend Finalised Plan Policy H4. (Draft Plan Policy H5).

Comment No: 15

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The Council seeks to impose its policy on developers without meaningful consultation.

Response:

Disagree. Provisions of Consultative Draft Structure Plan Policy H5 (Finalised Plan Policy H4) were not implemented. Supplementary Guidance, which was subject to public consultation and scrutiny is being implemented as a short term measure. The Draft Structure Plan was in the public domain from late November 2004. The public consultation period was in excess of the statutory period. In addition, informed discussions have also been held with the house building industry. The importance of consultation and the need for close working relationships is agreed.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Draft Plan Policy H5 does not investigate alternative measures available to local authorities to help increase the supply of affordable housing, e.g. application for Pressured Area Status.

Response:

These are not land use planning issues. However, Fife Council is indeed pursuing a range of other initiatives to facilitate affordable housing. These include reductions in Council Tax discounts for second homes, suspension of the Right-to-Buy in pressured areas and use of surplus Council owned land. The contribution of these other measures will be taken into account, once they have been implemented, in reviewing percentage requirements. Reference to a range of additional measures that the Council is pursuing has been inserted into the supporting text. Draft Plan Policy H5 now Finalised Plan Policy H4.

Action

Insert text to outline additional measures being taken.

Comment No: 17

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

There is no certainty in the Development Plan and Development Control process.

Response:

Affordable housing is a dynamic issue and a clear requirement is being set out in the Finalised Fife Structure Plan through Policy H4 (Draft Plan Policy H5). As a short term measure, Supplementary Guidance has been developed. This provides clear guidance for the development control process.

Action:

Progress affordable housing policy through Development Plan at earliest opportunity.

Comment No: 18

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The planning authority has not set out a clear policy in the Local Plan which must be justified by a Housing Needs Assessment as part of the Local Housing Strategy.

Response.

The Local Plan component of the Fife Development Plan is being rationalised with a move to three Local Plans (plus a Minerals Subject Plan). Only one Draft Plan, for St Andrews and East Fife, has been published so far, but the other two will follow in 2007 and 2008. These will contain appropriate responses to affordable housing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

It is impossible to fully assess the cost implications of the Policy at time of site purchase - indeed many of the sites to which the Council is seeking to apply the Policy have already been purchased.

Response:

Fife Council's intention to contribute to meeting the need for affordable housing has been known for some time. For example, the Local Housing Strategy which was published in the winter of 2004 set a requirement of 30%. In recent years, land values have risen markedly and so there should be no undue detrimental effects on sites either acquired recently or landbanked.

Action:

No Change

Comment No: 20

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The Draft Plan Policy H5 seeks contributions almost twice the benchmark figure of PAN 74.

Response:

Percentage requirements have been revised in light of the new Housing Needs and Affordability Study and PAN 74. They are consistent with advice contained in PAN 74. Draft Plan Policy H5 now Finalised Plan Policy H4.

Action:

Revise requirements in light of new study and PAN74.

Comment No: 21

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The requirements of Para 3.6 (Local Plan policies) have not been followed.

Response:

The Local Plan component of the Fife Development Plan is being rationalised with a move to three Local Plans (plus a Minerals Subject Plan). Only one Draft Plan, for St Andrews and East Fife, has been published so far, but the other two will follow in 2007 and 2008. These will contain appropriate responses to affordable housing. They will address the points in Draft Plan Para 3.6.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The threshold is set too low and should allow for off-site provision or commuted sums, but not as a last resort.

Response:

The Finalised Structure Plan now reflect the guidelines on thresholds and off-site provision in PAN 74. The use of commuted sums does have a role to play but does not promote mixed and diverse development. As such, Fife Council views their use as a last resort. On-site provision is preferred.

Action:

Change site thresholds in Finalised Plan Policy H4.

Comment No: 23

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Land should be transferred either at a value relating to its use for affordable housing or by agreement between the developer and Registered Social Landlords (RSL), at a lower value.

Response:

Agreed. Reference to transfer of land at "nil value" will be deleted. Amendment to reflect the change is made in the text.

Action:

Amend supporting text to Finalised Plan Policy H4 (Draft Plan Policy H5) to reflect transfer value of land.

Comment No: 24

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

There is a need to consider alternative means of provision outwith areas of strategic funding. Little consideration has been given to the availability of funding to RSLs in order to implement the policy.

Response:

Given the scale of the shortage of affordable housing in Fife and the level of the proposed requirement, it is considered that the contribution made by RSLs, valuable though it is, will only meet a proportion of the shortage. However, the contribution of RSL provision will be monitored annually and the percentage requirement adjusted as appropriate.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Provision of land for affordable housing should, where possible, be the subject of a planning condition.

Response:

The use of planning conditions and agreements will be promoted to ensure that applications for residential development are consistent with the Council's affordable housing requirements and are dealt with efficiently.

Action:

No Change

Comment No: 26

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Box 1 of PAN 74 has not been followed.

Response:

PAN 74 was published after the Consultative Draft Structure Plan was approved. The approach taken in the Finalised Plan is now broadly consistent with the advice.

Action:

Take into account advice contained in Box 1 of PAN74.

Comment No: 27

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

There is no understanding of residual land value.

Response:

Disagree. It is considered that the approach to the provision of affordable housing in the Structure Plan takes into account the issue of site economics. An appropriate degree of flexibility is built in to this approach.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

On site land should be transferred based on its value for affordable housing.

Response:

Agreed. Reference to transfer of land at "nil value" has been deleted. Amendment to reflect the change is made in text.

Action:

Amend supporting text to Finalised Plan Policy H4 (Draft Plan Policy H5) to reflect transfer value of land

Comment No: 29

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

It is impossible to link the Plan's requirements and the results of the Housing Needs and Affordability Study. There is no statistical basis for the requirements stated at housing market area level.

Response:

The Finalised Structure Plan has been informed by the results of the updated Study. The basis is housing market areas and this is set out in the Study itself. The statistical basis for the requirements is up to date and robust.

Action:

No Change

Comment No: 30

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Much of the actions required to address affordable housing requirements are matters for Fife Council and not housebuilders by improving Fife Council housing stock to meet the needs of its clients, disposal of surplus Council owned land, and seeking Pressured Area Status.

Response:

Fife Council is pursuing a range of measures to address the shortfall, including those mentioned. However, the planning system and housebuilders can also play a role. Housing needs have been quantified through a robust study and the requirement will be set out in the Development Plan. Such an approach is quite consistent with SPP3 and PAN 74. Reference to a range of additional measures that the Council is pursuing has been inserted into the supporting text.

Action:

Insert text to outline additional measures being taken.

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Affordable Housing

Comment:

Draft Report of Survey Para 5.271 refers to the 2000 Affordability and Housing Needs Study which only covers the period to 2005. The new Study has now become available. Consequently the section on affordable housing should be withdrawn.

Response:

The section on affordable housing has been updated to take into account the results of the new Study.

Action:

Update section on affordable housing to take into account results of the new Housing Needs and Affordability Study.

Comment No: 32

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Affordable Housing

Comment:

Clarification is sought on the calculation of affordable housebuilding 1981-2004 - does it include lower priced private housing?

Response:

This includes lower priced private housing. Table has been updated to include 2004-2005 statistics.

Action:

Update table in Report of Survey.

Comment No: 33

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Affordable Housing

Comment:

Para 5.284 of the Draft Report of Survey states that the Supplementary Guidance will be informed by the new Housing Needs and Affordability Study. The new Study has only just become available and this is seriously detrimental to the credibility of the Structure Plan and Local Plan consultations.

Response:

Disagree. The new Study has informed the Finalised Fife Structure Plan and will inform the Finalised St Andrews and East Fife Local Plan. These will both be subject to a period of public consultation. The Supplementary Guidance has been updated to take into account the new Study.

Action:

Update affordable housing sections of the Finalised Structure Plan, Report of Survey, and Supplementary Guidance on Affordable Housing, taking into account the results of the new Study.

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Developer Contributions

Comment:

Para 5.12 in the Draft Report of Survey overstates the position by suggesting that there is a practice of developers offering wider community services or benefits instead of just the need to provide the infrastructure required for a development to be built. The last sentence should be deleted as it incorrectly reflects National Guidance.

Response:

The Plan does not suggest that there is such a practice but rather sets out clearly what the requirements are and possible planning gain. Detailed discussions will follow once the process has been advanced via Area Local Plans, Master Plans and development briefs.

Action:

No Change

Comment No: 35

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Developer Contributions

Comment:

Para 5.16 in the Draft Report of Survey ignores the valuable contribution made by development in terms of providing homes, jobs and facilities.

Response:

The Report of Survey is the technical background document. Overall the Structure Plan documents recognise the contribution.

Action:

No Change

Comment No: 36

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Developer Contributions

Comment:

Para 5.18 in the Draft Report of Survey in seeking to maximise the impact of developer contributions fails to suggest a partnership approach.

Response:

Noted. Partnership working is supported. However, consider that existing wording adequately addresses the issue. Paragraph has been renumbered as Para 3.25.

Action:

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Housing Land Requirement

Comment:

In Draft Report of Survey Para 2.253: an allowance should be made in the St Andrews HMA to compensate for the high number of second and holiday homes.

Response:

Second and holiday homes comprise less than 1% of the Fife housing stock. While the majority are in St Andrews HMA, there is no evidence to suggest that this will significantly change over the Plan period. No specific provision has therefore been made in calculating the housing land requirement.

Action:

No Change

Comment No: 38

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Housing Land Requirement

Comment:

In Draft Report of Survey Para 5.225: A higher proportion of the target population should be directed to the Cupar and St Andrews HMAs, to recognise the development trends in these areas. The housing land supply has been so constrained that the completion figures are a serious underestimate of latest demand and potential. Figure 5.58 demonstrates an undue reliance on the delivery to be expected from windfall and small sites in the Cupar and St Andrews areas which has failed in the past.

Response:

The Plan Strategy is to regenerate Mid Fife, with the majority of additional housing growth directed to that area. Provision is made for modest growth in West and East Fife. Land to meet the requirement in St Andrews and East Fife will be identified in the Area Local Plan and monitored through the annual Housing Land Audit, which will identify any need for review.

Action:

Hargest & Wallace, Per Hammerson PLC, Hargest, Keith - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

Supports recognition in Draft Plan, para 3.21, that retailing has an important role in supporting economic growth and regeneration.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

Support recognition in Draft Plan Policy S3, that existing retail parks are an important resource and should be included within preferred destinations for new retail investment.

Response:

Support noted.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

Support requirement that new retail floorspace should be encouraged in locations with high transport accessibility, including existing retail parks.

Response:

Support noted.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

Recommend the complementary role of Fife's existing retail parks should be explicitly stated in retail policies.

Response:

Consider that Policy S3 adequately addresses role of retail parks. However, minor amendment is justified.

Action:

Change Policy S3 slightly to take further account of retail parks.

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

Reference should be made to directing new retail warehouses to existing retail parks/extensions and opposing freestanding units

Response:

Noted, but consider that Policy S3 adequately addresses this issue albeit with a minor amendment.

Action:

Change Policy S3 slightly to take further account of retail parks.

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

Policies S2 and S3 should be combined to produce clearer policy framework for appraisal of new retail floorspace proposals.

Response:

Combining Policies S2 and S3 would result in a lengthy Policy with a consequent reduction in clarity.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

Policy S3 does not limit new retail floorspace as identified by retail capacity studies. Supported by Hammerson.

Response:

Support noted. Policy has been amended to reflect updated research and the emerging strategy. There is no reference to specific limits.

Action:

Revise Policy S3. *Comment No:* 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

Para 3 of Policy S3 should be deleted as it is a comment, and not policy requirement.

Response:

Agree. Policy has been updated and para 3 deleted.

Action:

Delete paragraph 3 of Policy S3.

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

Analysis of retail capacity provides a useful context for Structure Plan but is flawed as technique for calculating specific floorspace requirements

Response:

Specific floorspace requirement is not set out in the Finalised Plan, Policy S3 has been reviewed. Analysis of retail capacity has a role to play, along with other types of studies, in informing strategic policy.

Action:

Update Policy S3 by deleting last paragraph.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

Introducing limits on floorspace is contradictory to first Policy Objective page 22 and, as a result, references to retail capacity studies in Policy S3 and footnote should be deleted.

Response:

Policy S3 has been revised and Footnote deleted. Reference to retail capacity has been deleted also

Action:

Revise Policy S3

Jenkins & Marr, Per Bett Homes, Roberts, Andrew - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Inclusion of North Dunfermline as an SDA is welcomed and supported.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Dunfermline

Comment:

Policy SDA1 welcomed and supported.

Response:

Welcome and support noted.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Inclusion of Dunfermline in Schedule H2 of Draft Plan is welcomed and supported.

Response:

Support noted.

Action:

Jenkins & Marr, Per BP Exploration Company Ltd, Roberts, Andrew - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

Requests Fife Matters recognises that the Forties Pipeline passes through the Structure Plan Area.

Response:

The pipeline corridor is afforded protection via the current Area Local Plans and the Minerals Subject Local Plan. There is no need to mention the pipeline in the Structure Plan.

Action:

Jenkins & Marr, Per Scarborough Development Group, Handley, John - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Recognition of the excellent accessibility of Rosyth Port and Rosyth Waterfront Area and its role as a major transportation hub in the Coastal Regeneration Zone welcomed.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Recognition that new development is to be directed to highly accessible locations, especially transportation hubs supported.

Response:

Support noted.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Desire to achieve balanced mixed communities welcomed.

Response:

Support noted.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Requirement to integrate major housing development with brownfield development opportunities to deliver regeneration opportunities supported.

Response:

Support noted.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Despite recognition of importance of Rosyth Waterfront - requests greater strategic recognition of the full redevelopment potential at Rosyth Waterfront including greater recognition of the mix of new uses and development opportunities available, based on planning approvals and scope for further complementary development.

Response:

Adequate recognition of Rosyth Waterfront in the Finalised Structure Plan. Detailed development issues will be dealt with via Area Local Plans, Master Plans and development briefs.

Action:

Strutt & Parker, Per Broadland Properties Limited, Lynch, Sinead - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

No objection to inclusion of policy seeking to address affordable housing in Fife. However, objects to level and percentage of affordable housing required on sites which provide over 9 dwellings. Considers 40% requirement in Cupar HMA excessive - 25% (as per PAN 74) reasonable.

Response:

Percentage requirements have been revised in light of the new Housing Needs and Affordability Study and PAN74. They are now consistent with advice contained in PAN74.

Action:

Change Finalised Plan Policy H4.

Strutt & Parker, Per Mr A Miller (Kellie Castle Farm), Lynch, Sinead - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

No objection to inclusion of policy seeking to address affordable housing in Fife. However, objects to level and percentage of affordable housing required on sites which provide over 9 dwellings. Considers 45% requirement in Arncroach, which lies in the St Andrews HMA, excessive - 25% (as per PAN 74) reasonable.

Response:

Percentage requirements have been revised in light of the new Housing Needs and Affordability Study and PAN74. They are now consistent with advice contained in PAN74.

Action:

Change percentage requirements in Finalised Plan Policy H4 (Draft Plan Policy H5).

Strutt & Parker, Per The Balcarres Estate, Fife, Lynch, Sinead - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

No objection to inclusion of policy seeking to address affordable housing in Fife. However, objects to level and percentage of affordable housing required on sites which provide over 9 dwellings. Considers 45% requirement in Colinsburgh, which lies in the St Andrews HMA, excessive - 25% (as per PAN 74) reasonable.

Response:

Percentage requirements have been revised in light of the new Housing Needs and Affordability Study and PAN74. They are now consistent with advice contained in PAN74.

Action:

Change Finalised Plan Policy H4 (Draft Plan Policy H5).

Strutt & Parker, Per Raith Estate, Kirkcaldy, Lynch, Sinead - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

No objection to inclusion of policy seeking to address affordable housing in Fife. Considers 25% requirement in Kirkcaldy, which lies in the Mid Fife HMA, as per PAN 74, is reasonable. However, each site should be assessed on a merit basis at the appropriate juncture.

Response:

Percentage requirements have been revised in light of the new Housing Needs and Affordability Study and PAN74. They are now consistent with advice contained in PAN74.

Action:

Change percentage requirements in Finalised Plan Policy H4 (Draft Plan Policy H5).

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Kirkcaldy West

Comment:

Raith Estates welcomes the designation of Kirkcaldy South West as a Strategic Development Area. Refers to Draft Plan Policies SS1, SDA1 and H2 and Schedule H2.

Response:

Welcome noted.

Action:

No Change to reference to Kirkcaldy South West.

Strutt & Parker, Per Mr & Mrs I F Crombie, Lynch, Sinead - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

No objection to inclusion of policy seeking to address affordable housing in Fife. However, objects to level and percentage of affordable housing required on sites which provide over 9 dwellings. Considers 40% requirement in Cupar HMA excessive - 25% (as per PAN 74) reasonable.

Response:

Percentage requirements have been revised in light of the new Housing Needs and Affordability Study and PAN74. They are now consistent with advice contained in PAN74.

Action:

Change Finalised Plan Policy H4 (Draft Plan Policy H5).

Montgomery Forgan Associates, Per Various Clients, Maclean, Emelda - Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Concerned that Policy SS1 requires detailed masterplans to be included in Local Plans. Masterplans should not be in Local Plans, as this approach would reduce flexibility to allow development to proceed and adapt, and would prohibit the potential for a joint approach which should include consultation and liaison with landowners, developers and the community.

Response:

Concerns noted. Local Plans will be updated every 5 years and there is also scope to promote Local Plan Alterations to address area specific issues including the bringing forward of masterplans as necessary.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

General approach to identifying Strategic Development Areas (SDAs) supported.

Response:

Support noted.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Support SDAs at Glenrothes, Kirkcaldy and Dunfermline, but concerned about extent and location of development proposed. Concerned over ability of the SDA to deliver scale of housing in proposed time periods. Concerned that infrastructure may not be delivered by developer contributions.

Response:

Support and concerns noted. Development is proposed for a period of 20 years and will be the subject of a review during this period. Glenrothes has been identified in the Finalised Structure Plan as a Strategic Land Allocation, rather than an SDA. 900 houses are proposed at Glenrothes East over the next 20 years.

Action:

Changes to the housing allocation across Fife, including Glenrothes, have been made in the Finalised Structure Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Disagree with inclusion of SDAs at Lochgelly and Levenmouth. Consider these SDAs to be in untested markets and delivery of housing uncertain. Concerned over ability of the SDAs to deliver scale of housing in proposed time periods. Concerned that infrastructure may not be delivered by developer contributions.

Response:

Concern noted. However, strategic housing allocations in Lochgelly and Levenmouth are quite consistent with the Plan's strategy of regenerating Mid Fife and reversing population loss in that area.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Concerned that 4,550 of 5,380 shortfall within Dunfermline & West Fife HMA allocated to Dunfermline. Not an appropriate balance between rural and urban development.

Response:

Concern noted. However, this is consistent with the Plan's strategy of focusing planned growth on existing settlements which already have infrastructure and facilities, including public transport networks, in place. Housing land requirement has been updated and a strategic land allocation of 500 houses identified for West Villages. Consider that a sufficient range of sites exists.

Action:

Update housing land requirement and identify a strategic land allocation of 500 units for West Villages.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Concerned that within St Andrews and East Fife HMA none of the shortfall directed, at strategic level, to Cupar and St Andrews. Both Cupar and St Andrews should be identified as SDAs and the housing requirements redistributed. The identification of St Andrews as a key centre supports SDA status. The designation of Cupar as an SDA would enable economies of scale to solve infrastructure problems and support northern relief road.

Response:

St Andrews and Cupar are separate HMAs. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Cupar is also identified in Finalised Structure Plan as a Strategic Development Area. A further 1,450 new houses are proposed at Cupar over the next 20 years, with 1,200 being on greenfield land to the north of the town to facilitate a relief road. This allocation of 1,450 new houses is an increase from the consultative draft Plan, which identified 600 – 1,000 houses over the same period. This change has been made in response to the comments received on the consultative draft Structure Plan, together with the need to provide a relief road and affordable housing in the town.

Action:

Housing allocation for St Andrews reduced from 1,000-1,800 to 1,200 in Finalised Plan. Housing allocation for Cupar increased from 600–1,000 to 1,450 in Finalised Plan.

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

Support strategic employment land allocation in St Andrews. Provision of strategic employment land in St Andrews supports case for St Andrews SDA status.

Response:

Support noted. However, the scale of development in St Andrews is not dependent on the amount of employment land.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Policy S1: Town Centres, which directs retail and leisure development to Cupar and St Andrews is supported. Definition of St Andrews as an SDA would be compatible with its definition as a strategic centre and assist meeting objectives.

Response:

Support for Policy S1 noted. SDA status refers to absolute numbers of houses proposed/scale of development area and is not related to town centre issues. However is designated as an SDA status in the Finalised Plan.

Action:

No Change

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

For sake of clarity Policy H1 should identify Housing Land Requirement for Housing Market Areas, not Local Plans, to accord with SPP3.

Response:

Agree. Policy H1 - Proposal H1 of the Finalised Structure Plan - sets out the Housing Land Requirement by Housing Market Area.

Action:

Amend Schedule 1 by Housing Market Areas.

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Support provision of extra households in addition to housing need.

Response:

Support noted.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Considers the additional 6,000 households disproportionately divided between HMAs. Considers more should be allocated to St Andrews and Cupar to assist in supporting the economy and relieving affordable housing issues.

Response:

Comments noted. The Plan strategy is to regenerate Mid Fife, with the majority of additional housing growth directed to that area. Land to meet the requirement in St Andrews and East Fife will be identified in the Area Local Plan and monitored through the annual Housing Land Audit, subject to review as necessary. The Finalised Plan Proposal H2 allocates 1,200 houses to St Andrews and 1,450 houses to Cupar.

Action:

Proposal H2 of the Finalised Plan allocates 1,200 houses to St Andrews and 1,450 houses to Cupar.

Comment No: 12

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Considers that housing land requirement is further constrained as no account has been taken of resident student population together with the proportionately high numbers of second homes.

Response:

The Report of Survey describes how the housing land requirement is calculated, which includes consideration of second and holiday homes. The student population is not relevant in this context.

Action:

No Change

Comment No: 13

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The Plan should allocate land to meet large demand for holiday, weekend and second homes in rural areas as suggested in SPP15 (para 24).

Response:

The Finalised Structure Plan Proposal H1 sets out the housing land requirement by Housing Market Area. Area Local Plans determine the location of sites and further consideration is being given to this issue in the context of the St Andrews & East Fife Local Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Object to calculation of shortfall in provision of housing land. Considers it is inconsistent that small sites are regarded as contributing to St Andrews & East Fife Local Plan area only.

Response:

Noted. PAN38 (para.28) states that it is for planning authorities to consider how to take account of the expected contribution of small sites. As these traditionally make up a significant proportion of the housing land supply in East Area, they are included for this area only. Small sites do not make a notable contribution to the supply for West and Mid Fife.

Action:

No Change.

Comment No: 15

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Considers shortfall of housing land in Cupar and St Andrews area is more acute than indicated. For this reason, both St Andrews and Cupar should be elevated to SDA status.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan, balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Cupar is identified in Finalised Structure Plan as a Strategic Development Area. A further 1,450 new houses are proposed at Cupar over the next 20 years, with 1,200 being on greenfield land to the north of the town to facilitate a relief road. This allocation of 1,450 new houses is an increase from the consultative draft Plan, which identified 600–1,000 houses over the same period. This change has been made in response to the comments received on the consultative draft Structure Plan together with the need to provide a relief road and affordable housing in the town.

Action:

Housing allocation for St Andrews reduced from 1,000-1,800 to 1,200 in Finalised Plan. Housing allocation for Cupar increased from 600-1,000 to 1,450 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Do not agree with all the settlements identified in Draft Plan Schedule H3. Considers the allocation in Guardbridge/Leuchars is excessive. Consider Leuchars would provide poor amenity due to presence of RAF Leuchars. Housing allocated to Guardbridge/Leuchars should be allocated to St Andrews.

Response:

Leuchars/Guardbridge is identified in the Finalised Structure Plan as a Strategic Land Allocation for 400 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-1,000 houses over the same period. This change has been made in response to the comments received on the draft Plan.

Action:

Housing allocation reduced from 750-1,000 to 400 in Finalised Plan.

Comment No: 17

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Greater flexibility should be incorporated into Draft Plan Policies H2 and H3 to accommodate change over Plan period if identified sites fail to deliver requirements. Areas under Policies H1, H2 and H3 should be regarded as minimums. The Policies should be revised by additional criteria to allow for other medium-scale sites to come forward through the Local Plan process.

Response:

Disagree. Draft Plan Policies H2 and H3 are combined into Proposal H2 in the Finalised Structure Plan and provide sufficient flexibility. The annual Housing Land Audit will monitor delivery of sites and indicate when the housing land requirement will require to be updated.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Draft Plan Policy H3 should be amended to specify that Local Plans may also identify medium-scale housing land allocations where appropriate.

Response:

Proposal H2 of the Finalised Structure Plan gives an indication of the locations and approximate scale of Other Strategic Land Allocations. Local Plans will give detailed consideration to the scale and siting of such development, subject to monitoring and review as necessary.

Action:

No Change

Comment No: 19

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Draft Plan Policy H5 should be amended by replacing "should" with "may" for consistency with SPP3.

Response:

There is no inconsistency between SPP3 and Finalised Plan Policy H4 (previously Policy H5). SPP3 recognises the probability of the private housebuilding industry being able to make a contribution and then directs the Development Plan to set out a policy where there are identified needs. Finalised Plan Policy H4 seeks to provide certainty on the Council's position, by setting out what is expected from developers.

Action:

No Change

Comment No: 20

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Draft Plan Policy H5 fails to identify how the Local Plan will deal with shortage of affordable housing other than setting requirements for developer contributions.

Response:

The planning system has a role in delivering new affordable housing. The Local Housing Strategy identifies other actions to improve the quantity and quality of affordable housing. Reference to a range of additional measures that the Council is pursuing has been inserted into the supporting text.

Action:

Insert text to outline additional measures being taken.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Draft Plan Policy H5 fails to comply with specific requirements of PAN 74 on a number of counts.

Response:

PAN 74 was published after the consultative draft Structure Plan was approved. It has been taken into account in the Supplementary Guidance on Affordable Housing and in the Finalised Structure Plan.

Action:

Take into account provisions of PAN74

Comment No: 22

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Concerned that if case made for affordable housing in excess of 25% (PAN 74), the additional element should not be met by private sector.

Response:

Percentage requirements have been amended in the light of PAN 74, the updated Housing Needs and Affordability Study and the public consultation. The only housing market area which has a requirement of above 25% is St Andrews, because of exceptional circumstances, and even then it is only slightly higher. This is generally consistent with PAN 74.

Action:

Revise percentage requirements.

Comment No: 23

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Concerned about requirement for affordable housing sought by Draft Plan Policy H6.

Response:

This has been revised in the light of PAN 74, the public consultation and the updated Fife Housing Needs and Affordability Study. Policy has been deleted but text reference will remain.

Action:

Delete Draft Plan Policy H6.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Rural Economy

Comment:

Consider Draft Plan Policy E3 is too restrictive. Bullet point four should be deleted and the Policy further amended to reflect contents of SPP15 and PAN 73.

Response:

Draft Structure Plan Policy E3 reflects the strategy which is to divert development to settlements and use brownfield land in preference to releasing greenfield land. Policy will be incorporated into Local Plans and has been deleted from the Finalised Structure Plan to avoid unnecessary duplication.

Action:

Draft Plan Policy E3 moved to Area Local Plans.

Comment No: 25

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Consider Green Belts around Dunfermline and St Andrews not necessary. Planning objectives can be achieved without Green Belts.

Response:

The principle of establishing Green Belts at St Andrews and Dunfermline was approved by Scottish Ministers in the current Structure Plan in July 2002. This revised Structure Plan is taking forward that commitment.

Action:

No Change

Comment No: 26

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

In the event that Green Belts are to be established, they should be delineated to accommodate development over the next 50 years, consistent with the approach being taken at Perth.

Response:

Support for long term approved is Green Belt boundary delineation noted, however, 50 year time scale as suggested is impractical.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Density

Comment:

Draft Plan Policy H8 should be amended to reflect Policy H4 in the approved Fife Structure Plan 2002 and reflect guidance in SPP3 which identifies Local Plans as the document for identifying density appropriate to locations and site.

Response:

Draft Plan Policy H8 seeks to secure efficient and sustainable use of land for residential development. Local Plans will provide more detailed guidance on this issue.

Action

Draft Plan Policy H8 is amended and forms Policy H6 of the Finalised Plan.

Montgomery Forgan Associates, Per A & J Stephen Ltd, Maclean, Emelda - Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Schedule H3 should be amended by increasing the allocation for Newburgh from 250-350 to 500 units to facilitate the level of development opportunity identified by A & J Stephen Ltd.

Response:

Newburgh is not identified as a Strategic Land Allocation in the Finalised Structure Plan. Development proposals for up to 300 houses over the period 2006-2026 will be progressed through the St Andrews and East Fife Local Plan.

Action:

Newburgh no longer identified as a Strategic Land Allocation.

Montgomery Forgan Associates, Per St Andrews Western Development Consortium, Maclean, Emelda - Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The Western Development Consortium generally supports the strategy for growth outlined in the Structure Plan.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The higher figure should be identified in respect of St Andrews under Schedule 3. Significantly greater capacity for housing land will require to be identified if the Structure Plan targets are to be met. The gap between housing land requirement and shortfall is questioned in each of the 5-year periods and requires to be clarified.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

St Andrews should be identified as a strategic growth area.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Concerned about Draft Plan Policy H3 and H4's reference to brownfield land which could prevent the release of greenfield land in St Andrews area where brownfield land is in short supply.

Response:

The preference for brownfield land is part of the strategy of the Finalised Structure Plan. However, it is accepted that in areas where brownfield land is not sufficient to implement the Plan, greenfield land will also require to be released. Draft Plan Policies H3 and H4 now Policies H2 and H3 in Finalised Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Consider that Draft Plan Policy H5 should be revised after publication of PAN 74. Consortium accepts the major requirement for affordable housing as in St Andrews but objects to the proposed 45% target set as it is not consistent with PAN 74.

Response:

PAN 74 was published after the Consultative Draft Structure Plan was approved. The Finalised Structure Plan and Supplementary Guidance on Affordable Housing have been updated as a result of PAN 74, the public consultation and the updated Fife Housing Needs and Affordability Study.

Action:

Change Finalised Plan Policy H4 (Previously H5).

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Development of mainstream housing should not be inhibited in the event that no funding is available from Communities Scotland.

Response:

In situations where there is a requirement for affordable housing but no funding available from Communities Scotland, such housing can still be provided. The definition of affordable housing that is used in the Finalised Structure Plan and Supplementary Guidance on affordable housing is broad and includes, for example, low cost housing for sale.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Master plans should not be included within Local Plans. Master plans should allow sufficient flexibility to enable development to proceed in advance. It should not be included within a Local Plan, which are subject to the provisions of Section 25 of the Town and County Planning (Scotland) Act. The current policy would prohibit the potential as a joint approach to masterplanning, which should include consultation and liaison with land owners, developers and the community and it should be amended accordingly.

Response:

It is considered that including masterplans in Local Plans gives the opportunity for public consultation on their contents.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

General approach for identifying strategic development areas is supported. However, have concerns over the ability of some of the identified SDAs to deliver the scale of housing proposed within the time period due to potential infrastructure problems.

Response:

Support and concerns are noted. Strategic allocations have been updated in the Finalised Structure Plan.

Action:

Amend Strategic Allocations

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Consortium concerned over the distribution of the housing supply. Within the St Andrews and East Fife housing market areas there is a shortfall of 4,580 houses, however none of the shortfall has been directed at strategic level to St Andrews. This approach fails to reflect its primary role as a service centre and undermines the sustainability strategy of the Plan, which primarily diverts development to main settlements.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is considered that St Andrews should be identified as an SDA and the housing requirement redistributed to the town. Strategic allocation at St Andrews would provide for the economies of scale to secure the planning objective for the town as identified in this Plan.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

A strategic growth area should be identified to the West of St Andrews. Proposals which have been submitted to Fife Council indicating that development to the West of St Andrews for 1000 houses is capable of being implemented within the Plan period. In addition, the development has the full agreement of all the landowners and there is no infrastructure constraints restricting development of the site.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

Policy E1, to develop strategic employment sites is supported, together with the identification of strategic employment land at St Andrews.

Response:

Support noted.

Action:

No Change

Comment No: 13

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

St Andrews is the only settlement which is identified for strategic employment land (Proposal PE1) but not also identified as a strategic development for housing. Both SPP1 and the Structure Plan provide support for sustainable, mixed-use developments. The provision of strategic employment land should be complemented by the provision of strategic housing land in order to ensure appropriate balance of uses within St Andrews.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Support for provision of extra households in addition to additional housing need. Object to the disproportionate distribution of this allowance between HMAs, which provides a driver to regenerate Mid Fife and the economy, but penalises St Andrews and East Fife. Additional housing in this area would assist in supporting the economy and relieving affordable housing issues. The 500 additional houses for East Fife should be increased.

Response:

Support noted. Objection noted. The Plan strategy is to regenerate Mid Fife, with the majority of additional housing growth directed to that area. Land to meet the requirement will be identified in Local Plans and monitored through the annual Housing Land Audit, subject to review as necessary.

Action:

No Change

Comment No: 15

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Housing requirement is further constrained within East Fife as no account appears to have been taken of the effect of the resident student population, and also of the disproportionately high number of holiday homes that are within the area.

Response:

The Report of Survey describes how the housing land requirement is calculated, which includes consideration of holiday homes. However, no specific provision has been made in calculating the housing land requirement. The student population is not relevant in this context.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Object to the calculation of the shortfall in housing land. It is inconsistent that small sites contribute only towards the St Andrews & East Fife Local Plan area. Small site completions are higher in the area partly due to constraint in the provision of larger greenfield allocations. This has resulted in an element of town cramming, which will be exacerbated if this constraint continues. There is an element of double counting, as the urban capacity study should have identified likely windfall/small sites. Windfall/small sites should not contribute to the anticipated supply of housing within this HMA.

Response:

Objection noted. PAN38 (para.28) states that it is for planning authorities to consider how to take account of the expected contribution of small sites. As these traditionally make up a significant proportion of the housing land supply in East Area, they are included for this area only. Small sites do not make a notable contribution to the supply for West and Mid Fife. There is no double counting as each site is identified as a windfall, small site or urban capacity; there is no overlap.

Action:

No Change

Comment No: 17

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

A shortfall of housing land in the St Andrews Housing Market Area is more acute than indicated in the Housing Land Requirement for the reasons referred to above. St Andrews should be elevated to a Strategic Development Area and included within Schedule H2.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The identification of areas under Policy H1, H2 and H3 of Draft Plan should be regarded as minima to allow for a range and choice to come forward in accordance with SPP3 and to allow for flexibility in the event of some of the sites identified by the Plan not coming forward within the Plan period.

Response:

Proposal H2 of the Finalised Structure Plan gives an indication of the locations and approximate scale of Strategic Development Areas and Other Strategic Land Allocations. Area Local Plans will give detailed consideration to the scale and siting of such development, subject to monitoring and review as necessary. This provides sufficient flexibility for the Plan period.

Action:

No Change

Comment No: 19

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

With regards to Draft Plan Policy H5 it is considered that this Policy fails to comply with the terms of SPP3 planning for housing and with PAN 74. The Policy states that "developers should provide affordable housing" and this is contrary to SPP3 which states that developers "may" provide for affordable housing. PAN 74 considers that Structure Plan should take into account the need for additional affordable housing in the housing land requirement however, the Policy fails to identify how the shortage will be met other than through a requirement for developers to contribute.

Response:

PAN 74 provides national advice on affordable housing. The Finalised Structure Plan is now consistent with this advice in providing an appropriate policy for Fife. Reference to a range of additional measures that the Council is pursuing has been inserted into the supporting text.

Action:

Change Finalised Plan Policy H4 (Previously H5) of Finalised Plan to reflect PAN74. Insert text to outline additional measures being taken.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Draft Plan Policy H5 fails to comply with the following specific requirements of Pan 74.

A) the Structure Plan should only indicate the scale and general location of affordable housing needs not set specific targets: this is the role of Local Plan.

- B) the benchmark is 25% affordable housing, except in specific and exceptional circumstances, and only when justified.
- C) the threshold is for twenty units in urban areas.
- D) where resources are not available from Communities Scotland, etc. other alternatives should be considered.
- E) the cost of other impacts of the viability of a development should be considered.

Response.

PAN 74 provides national advice on affordable housing. The Finalised Structure Plan is now consistent with this advice in providing appropriate policy for Fife.

Action:

Change Finalised Plan Policy H4 (Draft Plan Policy H5) to reflect PAN74.

Comment No: 21

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The advice in SPP3 and PAN 74 recognises the need for consultation. The Local Housing Strategy should be underpinned by a Housing Market Study and a housing needs assessment. The housing needs assessment was not published for consultation with Fife Matters and the Housing Market Study will only publish concurrently. The Local Housing Strategy was not subject to consultation with developers and we are concerned over the lack of consultation and consider this whole Policy should be reviewed.

Response:

Disagree. The Local Housing Strategy set the overall context for Fife Council's approach to meeting the need for affordable housing, but not detailed requirements. The new Housing Needs and Affordability Study was available on request during the consultation period, as was the draft report on housing market areas. A widespread and thorough consultation was held involving both the Consultative Draft Structure Plan and Supplementary Guidance.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

We are concerned that the definition of affordable housing does not include student accommodation.

Response:

The definition of affordable housing that is used in the Structure Plan and Supplementary Guidance on Affordable Housing is consistent with that contained in SPP3 and PAN 74. Neither of these two documents make specific reference to student accommodation.

Action:

No Change

Comment No: 23

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

We are concerned that if a case is made by the Council on targets for affordable housing in excess of 25% that the additional element over this target should not be met with the private sector. It would be unreasonable for development to mitigate for an existing situation which is "exceptional" and caused by factors outwith their control.

Response:

Percentage requirements have been amended in the light of PAN74, the updated Housing Needs and Affordability Study and the public consultation. The only housing market area which has a requirement above 25% is St Andrews, because of exceptional circumstances, and then it will only be slightly higher. This is generally consistent with PAN 74. It is considered reasonable for development to meet a requirement of 30%, as the development itself will exacerbate the existing exceptional circumstances.

Action:

Revise percentage requirements.

Comment No: 24

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Similarly concerned about Draft Plan Policy H6 and its requirement for affordable housing.

Response:

Draft Plan Policy H6 has been deleted from the Finalised Structure Plan and Supplementary Guidance on Affordable Housing. However, a text reference to affordable housing and non residential development is retained. In certain circumstances it is appropriate for a non residential development to make a contribution to affordable housing provision if that development exacerbates the shortfall of affordable housing.

Action:

Delete Draft Plan Policy H6.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

It is considered that a Green Belt is not necessary around St Andrews. The preservation of the character of the town, its setting and critical views to and from the historic core can be secured through other countryside planning policies; a Green Belt was not a necessity to secure this objective. In the event of a Green Belt being established it is considered that this should not be explicit, that it is maintained under review or that it should be designed to accommodate development over the next 50 years consistent with the approach being taken at Perth.

Response:

The Green Belt round St Andrews is an established commitment from the Approved Fife Structure Plan 2002. The Green Belt as in the Area Local Plan makes provision for development. A 50 year timescale as suggested is impractical.

Action:

No Change

Comment No: 26

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

In the event that Green Belts are to be established, they should be delineated to accommodate development over the next 50 years consistent with the approach being taken at Perth.

Response:

Support for long term approved is Green Belt boundary delineation noted, however, 50 year time scale as suggested is impractical.

Action:

No Change

Comment No: 27

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

With regard to Draft Plan Policy T1 it is the consortium's view that the Western development proposed peripheral relief road will contribute to policy objectives and in particular would be compliant with Draft Plan Policy T1. The consortium seek to have the St Andrews peripheral relief road listed under Draft Plan Proposal PT2.

Response:

The Western expansion of St Andrews and any associated link road will be addressed through the Local Plan process.

Action:

No Change (Draft Plan PT2 renumbered Proposal PT1 in Finalised Plan.)

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

With regard to Draft Plan Policy T3, whilst accepting that some development may require specific investment to facilitate the implementation of development, it is unacceptable for Section 75 Agreements to be imposed attaching development infrastructure obligations which are not required directly by the development. See Scottish Executive Circular 12/1996.

Response:

Policy DC1 of the Finalised Structure Plan addresses the issue of Transport Assessments, Travel Plans and developer contributions. Planning conditions, legal agreements and other suitable mechanisms will be used to secure appropriate developer contributions related to the scale, impact and timing of the development.

Action:

Draft Plan Policy T3 deleted.

Comment No: 29

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Water and Drainage

Comment:

Agree with Draft Plan Policy C1 and consider this should be reflected in Local Plan Policy.

Response:

Support noted. A revised Policy C1 incorporating Draft Plan Policies C1,C2, and C3 is contained in the Finalised Structure Plan. Core Local Plan policies are being revised in finalising the St Andrews and East Fife Area Local Plan.

Action:

New Policy C1 in Finalised Structure Plan, incorporating Draft Plan Policies C1,C2 and C3.

Comment No: 31

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Water and Drainage

Comment:

Agree with policy outlined in Draft Plan Policy C1.

Response:

Support noted.

Action:

New Policy C1 in Finalised Structure Plan, incorporating Draft Plan Policies C1,C2, and C3.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Affordable housing must remain affordable in perpetuity.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the Council will use legal mechanisms and/or Section 75 agreements. This has been actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

No Change

Comment No: 33

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

For reasons of clarity, Policy H1 should identify the housing land requirement for housing market areas rather than Local Plan, to accord with SPP3.

Response:

Agree. Proposal H1 of Finalised Plan now sets out the Housing Land Requirement by housing market area.

Action:

Show housing land requirement by Housing Market Areas in Finalised Plan Proposal H1.

Montgomery Forgan Associates, Per Mr I Spowart, Maclean, Emelda - Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

General approach to identifying Strategic Development Areas (SDAs) supported.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Support SDAs at Glenrothes, Kirkcaldy and Dunfermline, but concerned about extent and location of development proposed. Concerned over ability of the SDA to deliver scale of housing in proposed time periods. Concerned that infrastructure may not be delivered by developer contributions.

Response:

Support noted for principle of named SDAs. The development proposed is for a period of 20 years and will be the subject of review during this period. Concerns about development of infrastructure noted. Changes to the housing allocation across Fife, including Glenrothes, have been made in the Finalised Structure Plan.

Action:

Housing allocations amended and confirmed in Finalised Structure Plan.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Disagree with inclusion of SDAs at Lochgelly and Levenmouth. Consider these SDAs to be in untested markets and delivery of housing uncertain. Concerned over ability of the SDAs to deliver scale of housing in proposed time periods. Concerned that infrastructure may not be delivered by developer contributions.

Response:

Concern noted. However, strategic housing allocations in Lochgelly and Levenmouth are quite consistent with the Plan's strategy of regenerating Mid Fife and reversing population loss in that area.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

For sake of clarity, Policy H1 should identify Housing Land Requirement for HMAs (not Local Plans) to accord with SPP3.

Response:

Agree. Finalised Plan Proposal H1 now sets out the Housing Land Requirement by Housing Market Area.

Action:

Show housing land requirement by Housing Market Areas in Proposal H1 of Finalised Plan.

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Greater flexibility should be incorporated into Draft Plan Policies H2 and H3 to accommodate change over Plan period if identified sites fail to deliver requirements. Areas under Policies H1, H2 and H3 should be regarded as minima. The Policies should be revised by additional criteria to allow for other medium-scale sites to come forward through the Local Plan process.

Response:

Proposal H2 of the Finalised Structure Plan gives an indication of the locations and approximate scale of Strategic Development Areas and Other Strategic Land Allocations. Area Local Plans will give detailed consideration to the scale and siting of such development, subject to monitoring and review as necessary. This provides sufficient flexibility for the Plan period.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Concerned about scale of development being directed to Dunfermline (Draft Plan Schedule H2). Consider more housing should be directed to the rural area.

Response:

Concerns noted. The Structure Plan identifies the broad amount and location of new housing land, with a strategy of concentrating most greenfield development in a few strategic locations, such as Dunfermline, which will be integrated with existing settlements. The Area Local Plan will identify housing sites across the local plan area, which will include defining specific sites of Strategic Development Areas and the consideration of housing in the rural area.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Draft Plan Policy H5 fails to comply with specific requirements of PAN 74 on a number of counts.

Response:

PAN 74 was published after the Consultative Draft Structure Plan was approved. It has been taken into account in the Supplementary Guidance on Affordable Housing and in the Finalised Structure Plan.

Action:

Change Finalised Plan Policy H4 (Draft Plan Policy H5).

Montgomery Forgan Associates, Per David I Robertson (Farms) Ltd, Maclean, Emelda - Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Brownfield Land

Comment:

Reference to Crail Airfield in Draft Plan Para 4.31 are supported. However, concerned some policies in Fife Matters are not sufficiently flexible and may prohibit viable redevelopment proposals.

Response:

Comments noted. Each development proposal will be considered against all relevant policies contained within the Structure Plan and relevant Local Plan.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The housing land requirement should be increased. The calculation of the future supply is unreasonable and the shortfall in housing land will be higher than currently identified. Crail Airfield offers the opportunity to provide for further housing in East Fife in the event of a shortfall.

Response:

Comments noted. The calculation of the housing land requirement is described in the Report of Survey and accords with SPP3 and PAN38. The issue of Crail Airfield is more properly addressed by the St Andrews & East Fife Local Plan and will be considered in this context.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Crail Airfield should be identified in Schedule 3 or alternatively criteria developed under Draft Plan Policy H2 to allow flexibility in Local Plans to consider allocation of other medium-scale settlement expansions. Inappropriate for Structure Plan to be conclusive over requirements for medium-scale expansion prior to housing land assessments undertaken for housing land in Local Plans. Additional criteria should be included in Policy H3 to reflect SPP15 and acknowledge that, in appropriate circumstances, local plans may also identify brownfield land outwith settlement limits where this meets local plan objectives.

Response:

Proposal H2 of the Finalised Structure Plan gives an indication of the locations and approximate scale of Strategic Development Areas and Other Strategic Land Allocations. Area Local Plans will give detailed consideration to the scale and siting of such development, subject to monitoring and review as necessary. This provides sufficient flexibility for the Plan period. Policy BL1 of the Finalised Structure Plan (Draft Plan Policy ENV2) addresses the rehabilitation and re-use of brownfield land. Local Plans will identify countryside areas of derelict and/or vacant land and propose new uses, where appropriate.

Action:

Addition of Policy BL1 (Draft Plan Policy ENV2).

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Draft Plan Policy H5 should be amended by replacing "should" with "may" for consistency with SPP3.

Response:

There is no inconsistency between SPP3 and Finalised Plan Policy H4 (was H5). SPP3 recognises the probability of the private housebuilding industry being able to make a contribution and then directs the Development Plan to set out a policy where there are identified needs. Finalised Plan Policy H4 seeks to provide certainty on the Council's position, by setting out what is expected from developers.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Draft Plan Policy H5 fails to comply with specific requirements of PAN 74 on a number of counts.

Response:

PAN 74 was published after the Consultative Draft Structure Plan was approved. It has been taken into account in the Supplementary Guidance on Affordable Housing and in the Finalised Structure Plan. Draft Plan Policy H5 now Finalised Plan Policy H4.

Action:

Change Finalised Plan Policy H4.

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Rural Economy

Comment:

Consider Draft Plan Policy E3 is too restrictive. Bullet point 4 should be deleted and the policy further amended to reflect contents of SPP15 and PAN 73.

Response:

Draft Plan Policy E3 reflects the strategy which is to divert development to settlements and use brownfield land in preference to releasing greenfield land. Policy will be incorporated into Local Plans and has been deleted from Finalised Structure Plan to avoid unnecessary duplication.

Action:

Draft Plan Policy E3 included in Area Local Plans.

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Density

Comment:

Draft Plan Policy H8 should be amended to reflect Policy H4 in the approved Fife Structure Plan 2002 and reflect guidance in SPP3 which identifies Local Plans as the documents for identifying density appropriate to locations and site.

Response:

Draft Plan Policy H8 (renumbered Policy H6 in Finalised Plan) seeks to secure efficient and sustainable use of land for residential development. Local Plans will provide more detailed quidance on this issue.

Action:

Changes have been made to Finalised Plan Policy H6 in response to comments received.

Montgomery Forgan Associates, Per The Skene Group, Maclean, Emelda - Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Aggregates

Comment:

Objects to Policy M2 which should be deleted. Considers policy not consistent with Circular 12/1996. Benefits not related to site.

Response:

Disagree. It is considered the benefits should be extended to those who may be remote from minerals operations yet are affected, for example, by an increase in heavy vehicle traffic. Policy M2 retained but reworded by deleting second sentence.

Action:

Policy M2 reworded.

Farningham McCreadie Partnership, Per Abercorn Estates, Plant, Joanne - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Aggregates

Comment:

Support Proposal PM1.

Response:

Support noted, but Proposal has been deleted from Finalised Structure Plan. However, there is a commitment to reviewing the Minerals Subject Local Plan set out in the supporting text.

Action:

Delete Proposal PM1.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Supports further greenfield land releases at Letham as an alternative to concentrating new housing in Cupar. Concentrating on Cupar may be more sustainable but will not ensure variety and range of sites required by SPP3 and other Structure Plan objectives.

Response:

The detail of sites for development is more properly addressed by the St Andrews & East Fife Local Plan. Comment will be considered in this context. Cupar is identified in Finalised Structure Plan as a Strategic Development Area. A further 1,450 new houses are proposed at Cupar over the next 20 years, with 1,200 being on greenfield land to the north of the town to facilitate a relief road. This allocation of 1,450 new houses is an increase from the consultative draft Plan, which identified 600–1,000 houses over the same period. This change has been made in response to the comments received on the consultative draft Structure Plan together with the need to provide a relief road and affordable housing in the town.

Action:

Housing allocation increased from 600–1,000 to 1,450 in Finalised Plan.

Farningham McCreadie Partnership, Per Royal Mail Group PLC, Plant, Joanne - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Policy SDA1 proposes consultations on Master Plans with various interested parties. Royal Mail Group plc wishes to be involved in masterplanning of SDAs.

Response:

Royal Mail interest in Master Planning process noted. Royal Mail will be consulted during the Local Plan preparation exercise.

Action:

Farningham McCreadie Partnership, Per The Old Course Limited, Plant, Joanne - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Supports further greenfield land releases at Craigtoun/Mount Melville as an alternative to concentrating new housing in St Andrews. Concentrating on St Andrews may be more sustainable but will not ensure variety and range of sites required by SPP3 and other Structure Plan objectives.

Response:

Noted. The detail of sites for development is more properly addressed by the St Andrews & East Fife Local Plan. Comment will be considered in this context. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation revised from 1,000-1,800 to 1,200 in Finalised Plan.

Farningham McCreadie Partnership, Per Muir Group, Farningham, Alan - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Density

Comment:

Draft Plan Policy H8 should include a specific density range for executive-style housing.

Response:

New residential development should make the most efficient use of land and Finalised Plan Policy H6 (Draft Plan H8) aims to aid the creation of quality, balanced, mixed communities. The policy has been amended to allow for low density where executive housing is considered appropriate.

Action:

Changes have been made to the Finalised Plan Policy H6 in response to the wider comments raising concern in respect of the consultative draft policy.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Not clear how Fife Council has derived affordable housing needs and greater justification and dialogue with stakeholders required.

Response:

An updated Housing Needs and Affordability Study was undertaken. The Finalised Report of Survey and Supplementary Guidance on Affordable Housing set out in detail the methodology and justification for the Housing Needs requirement calculation. A wide range of stakeholders was consulted and provided feedback as part of the consultation on the Draft Structure Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Council acknowledges that affordable homes provision is a burden on land and acknowledges it should not impact on economics of individual housing developments. Application of Draft Plan Policy H5 should be flexible where land has been purchased or on option of purchase at residential value. City of Edinburgh Council has applied application of similar policy by imposing affordable provision on sites purchased after a certain date.

Response:

The current approved Fife Structure Plan (2002) identifies the need for affordable housing in Fife. The Local Housing Strategy published in 2004 set an overall requirement of 30%. Therefore the need for affordable housing in Fife has been known for a number of years. In recent years, land values have risen markedly and so there should be no undue detrimental effect on sites either purchased or taken on option recently or landbanked. Draft Plan Policy H5 now Finalised Plan Policy H4.

Action:

Drivers Jonas, Wood, Alastair - Glasgow

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Endorse approach in Proposal PS1 to review of Town Centres. Strategy should be informed by shopper survey to provide retail spending information. Study should identify towns where additional retail floorspace should be provided via Local Plans.

Response:

Proposal PS1 has been revised and the original provisions subsumed into Policy S3, although the commitment to action plans and regeneration strategies is unaltered. Fife Council will monitor the retail sector, through various surveys, as part of the forward planning process.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

Endorse approach to back up Policy S3 with a detailed retail capacity study.

Response:

Support noted.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

Object to possibility of Structure Plan being approved prior to retail capacity and full shopper survey being completed.

Response:

Noted. The Retail Capacity Study and other research has informed the Finalised Plan.

Action:

Montagu Evans, Per Grampian Country Food Group Limited, Sidgwick, Alison - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

In relation to Draft Plan Paras 1.29 and 2.2, the preference for the re-use of brownfield sites over greenfield sites should not be restricted to brownfield sites in urban areas.

Response:

Finalised Plan Policy BL1 (Draft Plan Policy ENV2) relates to all brownfield sites, irrespective of location.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Considers Policy SS1 restricting development in the countryside is overly restrictive. Such a change of policy is supported by SPP2 and SPP15.

Response:

Disagree. Policy SS1 allows for exceptions that can be justified. More detailed policies are contained within the Area Local Plans.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Considers that in view of guidance in SPP15 re changing role of countryside and rural areas Fife Structure Plan should include a policy on redevelopment of redundant brownfield sites.

Response:

Finalised Plan Policy BL1 (Draft Plan Policy ENV2) relates to all brownfield sites, irrespective of location.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Considers that Draft Plan Policy E3 is supportive of redevelopment of sites in rural areas and there should be a similar policy in support of rural residential development.

Response:

Disagree. This would not be consistent with strategy as set out in Policy SS1 which seeks to direct development to settlements unless a rural location can be justified. Draft Plan Policy E3 moved to Area Local Plans.

Action:

Draft Plan Policy E3 moved to Area Local Plans.

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Brownfield Land

Comment:

Generally supportive of Draft Plan Policy ENV2, but policy should be reworded to advise that appropriate small-scale residential development may also be acceptable.

Response:

Draft Plan Policy ENV2 (now Policy BL1 of the Finalised Structure Plan) does not rule out the redevelopment of brownfield sites for residential use, provided it is consistent with this and other Development Plan policies.

Action:

Draft Plan Policy ENV2 has been renamed BL1 in Finalised Structure Plan.

Montagu Evans, Per CRE Energy Ltd, Sidgwick, Alison - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Policy SS1 should not be intended to preclude renewable energy development within rural areas.

Response:

Policy SS1 makes it clear that developments which have a justified need for a countryside location are acceptable.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Supportive of Policy Objective in Draft Plan at para 4.5

Response:

Support noted.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Policy R1 of the Draft Plan should be revised to clearly recognise and support involvement of local people.

Response:

The Council is aware of the potential for communities to be involved in locally driven renewable energy development.

Action:

Policy R1 of the Draft Plan has been transferred to the Area Local Plans.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Whilst support use of brownfield sites, Fife Council should be aware that it is not generally possible for renewable energy developers to compete with commercial property developers for brownfield sites.

Response:

Noted. Unlikely to be similar pressure for rural brownfield sites.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Points in Paras 3.6-3.8 of the Draft Plan should be reflected in text supporting Policy R1.

Response:

This approach would be result in unnecessary repetition.

Action:

Policy R1 of the Draft Plan has been transferred to the Area Local Plans.

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Draft Plan Para 4.8 identifies supporting information for applications for wind turbines and farms. It is considered that a landscape capacity assessment is not part of Landscape and Visual Assessment and any landscape capacity assessment should be responsibility of other agency (e.g. local authority or Scottish Natural Heritage). Landscape capacity assessment is an overall assessment, not site-specific.

Response:

An assessment of the landscape capacity which has been undertaken will feed into delineation of Areas of Search in Area Local Plans and other interim guidance, as appropriate.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Not supportive of proposed search area, existing Structure Plan covers much of the Local Authority area. Reference to broad search areas should be removed and a criterion attached to Draft Plan Policy R3 that prohibits development within international and nationally scenically protected areas. This would protect designated areas such as Historic Gardens and Designed Landscapes.

Response:

NPPG6 advocates the broad areas of search approach. Area Local Plans and other interim guidance as appropriate, will take account of a number of natural and built environment policies in delineating detailed Areas of Search.

Action:

Finalised Plan Policy R1 is a revised version of Draft Plan Policy R3, but reference to Areas of Search retained.

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

In the event that Council pursues search area approach, policy should make it clear proposals for wind farms outwith this area will also be considered positively as indicated by National Guidance. In the event that search area is to be reassessed, Council should liaise with known wind farm developers to ensure that all available relevant information is considered, including wind speeds.

Response:

The reason for adopting the search area approach is to assist developers to identify potential sites in areas where there is greatest consistency with Development Plan policy and other guidance. Suggestion that positive support is given to areas outwith search areas is not consistent with a search area approach. The industry will have the opportunity to consider and comment on search areas delineated in Area Local Plans.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

If criterion of broad search areas promoted, reference to landscape capacity in introductory text of Draft Plan Policy R3 should be replaced with a reference to a landscape and visual context or amenity. Landscape capacity is not considered to be relevant and will not form part of any EIA or LVA.

Response:

In view of the ever increasing scale of turbines, fit in the landscape is an important issue. EIAs are the subject of scoping exercises and Fife Council will require EIAs to address landscape capacity issues.

Action:

Draft Plan Policy R3 is Policy R1 in Finalised Plan, which retains reference to landscape capacity.

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Policy R3, bullet point 1 of the Draft Plan is considered to be meaningless. Landscape cannot absorb features but may or may not be able to accommodate them.

Response:

Policy R3 states that proposals are most likely to be supported where they are consistent with the criteria. Policy R3 does not place a blanket ban as suggested. Draft Plan Policy R3 is now Finalised Plan Policy R1.

Action:

Replace "absorb" with "accommodating" in Finalised Plan Policy R1.

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Welcomes bullet point 2 of Policy R3 of the Draft Plan. However, suggests phrase "landscape and environment" is not clear. Suggest replace with "landscape and visual context".

Response:

Policy R3 states proposals are most likely to be supported where they are consistent with the criteria. Policy R3 does not place a blanket ban as suggested in the comments re Policy R3. Support and concerns noted. Revise policy to clarify. Draft Plan Policy R3 now Finalised Plan Policy R1.

Action:

Amend to include "wider" before "environment" in Finalised Plan Policy R1.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Third bullet point of Policy R3 of Draft Plan is overly subjective. Council should make it clear if it requires the effects on all residents to be assessed. Council should define "nearby" and "amenity".

Response:

Finalised Plan Policy R1 (Draft Plan Policy R3) states that proposals are most likely to be supported where they are consistent with the criteria. Finalised Plan Policy R1 does not place a blanket ban, as suggested in the comments re Finalised Plan Policy R1. In response to this comment, determinations will be made on an objective basis. The current policy wording allows for consideration of proposals on a site-by-site basis. Factors to be considered will be identified either at the EIA scoping stage or through pre-application discussions.

Action:

No Change to Finalised Plan Policy R1.

Comment No: 13

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Reference in final paragraph of Policy R3 of Draft Plan referring to Fife Landscape Character Assessment (FLCA) should be removed. Considers technology has changed since 1999 and Scottish Natural Heritage has expressed reservations about FLCA.

Response:

Accept FLCA does not provide definitive guidance on wind turbines. However, it remains a valuable reference document when considering landscape issues in Fife. Work of FLCA has been taken forward by landscape capacity assessment exercise. Draft Plan Policy R3 now Finalised Plan Policy R1.

Action:

No Change to Finalised Plan Policy R1.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Consider it inappropriate to place embargo on wind energy developments located on migratory and other bird flight paths, as specified in bullet point four of Policy R3 of Draft Plan. This issue should be addressed in EIA. Bullet point four should be deleted.

Response:

Policy R3 states proposals are most likely to be supported where they are consistent with the criteria. Policy R3 does not place a blanket ban as suggested in the following comments re Policy R3. Agree issue could be addressed as part of EIA, but deleting bullet point four could result in determination of proposals without full consideration of bird protection issues. Draft Plan Policy R3 now Finalised Plan Policy R1.

Action:

No Change to Finalised Plan Policy R1.

Comment No: 15

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Supporting text under heading of Energy does not make clear significant level of support for and commitment to renewable energy development. Text should be expanded to make clear provisions of NPPG6, PAN45 and Scottish Executive response to Enterprise and Culture Committee Report.

Response:

There is no need for the Structure Plan to reiterate the contents of Scottish Executive Policy and Advice. The role of these documents is set out in the Introduction, under the heading "The Structure Plan in Context". Support for renewable energy clearly stated in Policy Objective following para 3.62 of Finalised Plan.

Action:

Stirling Developments, Stirling, Peter - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Fully supportive of Key Strategies and Policies.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Would be encouraged to see some recognition of benefits associated with development in South West sector and it's capacity to support growth of Rosyth without compromising issues such as coalescence.

Response:

Settlement coalescence in the Forth Bridgehead area will be addressed via Policy ENV1 which promotes Green Belts around Dunfermline and Policy SS1.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

With housing encouraged in South West Dunfermline an appropriate area for further employment land is that adjacent to Pitreavie Industrial Estate, to the west of the railway, which would serve as a natural extension to this successful and desirable business location.

Response:

Proposal PE1 addresses this issue and employment land will be allocated as part of the SDA. The precise location will be addressed via the Local Plan and master plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

A park and choose facility should be located at Rosyth station.

Response:

Finalised Plan Proposal PT1: Transport Proposals reflects the priorities of the Local Transport Strategy. Rosyth is now included as a location for park and ride and/or choose facilities/interchange.

Action:

Amend Finalised Plan Proposal PT1.

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Agree there is an opportunity to realign Dunfermline as a vibrant concentric city with exemplary design complementary to existing historic fabric. Welcome the Council's desire to raise design aspirations of all stakeholders, encouraging this degree of quality across the housing provision spectrum.

Response:

Support noted.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Application of strategic release of predominantly greenfield land in form of Strategic Development Areas appropriate, resulting in a sustainable approach to releasing sites rather than in a piecemeal fashion, would be wholly appropriate in the Dunfermline South West sector and facilitate appropriate associated land uses such as woodlands and parks.

Response:

Support for long-term planning of Dunfermline South West area noted.

Action:

Jones Lang LaSalle, Per The Woodford Group, Bell, David - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Concerned that there is no further justification, beyond National Planning Framework (NPF), for development priority to secure regeneration and renewal, for the strong focus on Mid Fife. Request a clear statement on justification for the over-riding presumption in favour of Mid Fife.

Response:

Fife Council, prior to the publication of the Draft Structure Plan, had identified the need for addressing the regeneration and renewal of settlements in the Mid Fife area. The approach in the Finalised Structure Plan is to divert some housing and employment land to the area, which, together with other initiatives, seeks to redress the current imbalance.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Requests that Mid Fife should not be considered to the exclusion of the other areas of the region which also experience disadvantage and which offer the opportunity for major brownfield development and environmental remediation. A detailed analysis of contribution that could be made by West Fife should be considered.

Response:

The Finalised Structure Plan makes it clear that regeneration is an issue to be addressed across Fife. Policy BL1 (previously Draft Plan Policy ENV2) provides the framework for consultation of environmental remediation of brownfield sites which need not be necessarily addressed by site redevelopment proposals.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Development of Comrie Colliery site would meet aims as set in Policy SS1 and recommend that the Comrie proposal should be allocated as a Strategic Development Area as set out in Policy SDA1.

Response:

Specific reference to the Comrie Colliery site, and the possibility of small scale housing is now made in Chapter 2. However, this should be seen in the context of the overall strategic aims of the Finalised Structure Plan which aims to focus development on existing settlements. Proposal H2 now includes a strategic allocation of 500 units for West Villages.

Action:

Insert reference to Comrie Colliery in Chapter 2 and amend Finalised Plan Proposal H2.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Support Fife Council Strategy to increase employment opportunities and reduce economic disparities throughout Fife. Welcome desire to grow Fife's population. Consider West Fife is well suited to delivering both and Comrie Colliery site could make a contribution. Recommend that a strategic allocation of development should be made in West Fife, recognising the wide range of benefits that would result.

Response:

Support noted. Reuse of Comrie Colliery site is mentioned in Chapters in 2 and 3 of the Finalised Structure Plan. Strategic housing land allocations have also been amended.

Action:

Include reference to Comrie Colliery site in text of Chapter 2.

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Note Fife Matters recognition of importance of connecting land uses and reducing the need to travel. Consider the proposed development at Comrie Colliery, being situated in West Fife, is less constrained in strategic access terms by bridge crossings of Forth and Tay. In addition, proposed new Kincardine Bridge will provide efficient access into core network in central Scotland.

Response:

Comment noted.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Consider there should be a mechanism in policy to allow discretion on requirements for levels of affordable housing where there are exceptional circumstances. Should be a clear set of criteria to facilitate reduced affordable housing from sites which exhibit significant development constraints and high remediation costs.

Response:

This issue is addressed by the Supplementary Guidance on Affordable Housing and would apply when the requirement for affordable housing would render a development uneconomic. However, such circumstances would have to be clearly demonstrated to the satisfaction of Fife Council.

Action:

Insert additional sentence into Supplementary Guidance to address this issue.

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Figures set in Draft Plan Policy H5 in excess of Government Guidance, which advises benchmark of 25%. Highlight this in relation to other developer contributions expected as set out in Policies DC1 and DC2.

Response:

Percentage requirements have been revised in light of the new Housing Needs and Affordability Study and PAN74. They are consistent with advice contained in PAN74.

Action

Change Finalised Plan Policy H4 (previously Policy H5).

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Welcomes strategy desire to align new housing to meet need and demand in terms of demographic change. However, strategy should clearly consider the regeneration benefits from targeted spatial policy of dispersal of housing allocation throughout Fife. Recommend that the pattern of regional development should be undertaken in a more considered, balanced and justified manner, rather than a blunt focus on all major housing development in Mid Fife.

Response:

Support noted. The allocations of land for development are spread throughout Fife. However, it should be recognised that Mid Fife is the focus of significant new development proposals. Update strategic housing land allocations.

Action:

Change strategic housing land allocations across Fife. Update Finalised Plan Proposal H2.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Fife Matters should recognise Comrie Colliery site would provide a sustainable community development in its own right. It would regenerate the West Villages area and promote rural development and renewal in compliance with National Policy, which recommends when considering a new settlement planning authorities should specify scale and location in development plan.

Response:

Specific reference to the Comrie Colliery site, and the possibility of small scale housing is now made in Chapter 2. However, this should be seen in the context of the overall strategic aims of the Finalised Structure Plan which aims to focus development on existing settlements. Proposal H2 now includes a strategic allocation of 500 units for West Villages.

Action:

Insert reference to Comrie Colliery in Chapter 2 and amend Finalised Plan Proposal H2.

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Natural Environment

Comment:

Fife Matters should recognise that redevelopment of Comrie Colliery would result in significant environmental enhancement and a positive ecological regenerational effect on Lockshaw Moss SSSI.

Response:

Support for the rehabilitation of brownfield land provided it is consistent with Finalised Plan Policy BL1(Draft Plan Policy ENV2). The Finalised Structure Plan cannot be site specific to the extent suggested and make comments of the nature suggested in advance of detailed proposals and consideration through the Local Plan process.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Consider further consideration should be given to contribution of Comrie Colliery to industrial, business and housing land supply for Fife. Would reduce need to release greenfield sites. The omission of this, the largest brownfield site in Fife, from the Development and Settlement Strategy is not justifiable and requires further detailed consideration.

Response:

Specific reference to the Comrie Colliery site, and the possibility of small scale housing is now made in Chapter 2. However, this should be seen in the context of the overall strategic aims of the Finalised Structure Plan which aims to focus development on existing settlements. Proposal H2 now includes a strategic allocation of 500 units for west Villages. Reference is also made in chapter to other uses such as leisure and tourism.

Action:

Insert reference to Comrie Colliery in Chapter 2 and amend Finalised Plan Proposal H2. Include reference to other uses, including leisure and tourism in Chapter 3.

Comment No: 12

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Brownfield Land

Comment:

Remediation and regeneration of Comrie Colliery would be undertaken by comprehensive private sector initiative at a time of significant pressure on public sector resources. Fife Matters should provide clarity on the opportunity presented by Comrie Colliery site, which satisfies the test of effectiveness set out in PAN 38.

Response:

The Policy and Resources Committee of Fife Council which met on 9th January 2003 to consider the strategy for the 20 year Plan agreed that one of the guiding principles was "to guide economics and other benefits of a growing population to existing settlements, there should be no new, free-standing towns or villages in Fife during the Plan period". Consider site should be remediated and has potential for redevelopment, perhaps involving small scale housing.

Action:

Insert additional text in Finalised Plan at Chapter 2 to reflect consideration for small scale housing (along with Crail Airfield).

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Brownfield Land

Comment:

Residential use should not be excluded in terms of potential use for Comrie Colliery site.

Response:

Comment noted. Para 3.4 of the Finalised Structure Plan explicitly excludes large-scale housing. Consideration for small scale residential use is set out in para 2.6 of the Finalised Structure Plan. This will be taken forward through the new Dunfermline and West Fife Local Plan.

Action:

Jones Lang LaSalle, Per Grosvener Developments, Hogg, Jason - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Leisure Facilities

Comment:

Fife Matters makes no reference to Fife Leisure Park (Halbeath, Dunfermline). A reference should be added to Paragraph 3.22 of Draft Plan to indicate its ongoing development. Draft Plan paragraph 3.25 should also be amended to add "and committed developments which are being implemented."

Response:

There is no requirement to refer in the Structure Plan to areas identified for a particular purpose. This is more appropriate to the Dunfermline and West Fife Local Plan.

Action:

Halliday Fraser Munro, Per Headon Developments Limited (Cupar), Stewart, Nicola - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Fife's Development Strategy to grow its economy and increase its population is strongly supported and Fife Council is to be congratulated on the pro-active approach.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Settlement strategy encourages development in a number of settlements throughout Fife which supports principles of sustainability and is a pragmatic approach.

Response:

Support noted. Strategic housing allocations have been reviewed in the Finalised Structure Plan.

Action:

Change housing allocations in the Finalised Structure Plan (Proposals H1 and H2).

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

As Cupar satisfies national guidance and many requirements for siting development as specified in Policy SS1, it should be identified as a Strategic Development Area. This would also contribute to the continued growth of Cupar as a thriving market centre and a former County town.

Response:

Cupar is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,450 new houses are proposed at Cupar over the next 20 years, with 1,200 being on greenfield land to the north of the town to facilitate a relief road. This allocation of 1,450 new houses is an increase from the consultative draft Plan which identified 600 -1,000 houses over the same period. This change has been made in response to comments received on the consultative draft Structure Plan together with the need to provide a relief road and affordable housing in the town.

Action:

Change housing allocation from 600-1,000 to 1,450 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Density

Comment:

Draft Plan Policy H8 is too prescriptive. Level of detail more appropriate to Local Plans. Densities should also be based on merits and characteristics of individual sites.

Response:

Finalised Plan Policy H6 (Draft Plan Policy H8) seeks to secure efficient and sustainable use of land for residential development. Local Plans will provide more detailed guidance on this issue.

Action:

Changes have been made to Finalised Plan Policy H6 in response to comments received.

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Commonly accepted that developers will have to meet some of the inevitable infrastructure costs for large-scale developments. Whilst approach is promoted by Government and re-iterated in Fife Matters in Policy DC1, in order to achieve development contributions must be realistic and relate to the scale of the development. The range of facilities to be provided by developer contributions specified in Fife Matters may be viewed by Fife Council as essential requirements, a more realistic approach must be taken to ensure development proposals come forward. Fife Council must accept the residual value of land and if all elements of gain are to be met it may well discourage landowners to proceed with sale.

Response:

The Finalised Structure Plan sets the strategic policy approach. Detailed discussions will follow once the process has been advanced via Area Local Plans, Master Plans and development briefs.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Concerned about level and percentage of affordable housing required. Considers 40% requirement in Cupar HMA is in excess of 25% requirement (as per PAN 74) and Structure Plan Policy is contrary to this guidance. In addition Local Housing Strategy and Housing Needs Study which provides justification for affordable housing policy are not yet available.

Response:

PAN 74 was published after the Consultative Draft Structure Plan was approved. Percentage requirements have been revised in light of the new Housing Needs and Affordability Study and PAN74. They are consistent with advice contained in PAN74. The Local Housing Strategy for Fife was published in 2004 and the updated Housing Needs and Affordability Study was and is available on request.

Action:

Change Finalised Plan Policy H4 (Previously Policy H5).

Halliday Fraser Munro, Per Headon Developments Limited (Guardbridge), Stewart, Nicola - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Fife's Development Strategy to grow its economy and increase its population is strongly supported and Fife Council is to be congratulated on the pro-active approach.

Response:

Support noted. The proposed scale of development is considered appropriate to meet the projected requirements for the period to 2026. The strategic housing land allocations have been reviewed and are set out in the Finalised Structure Plan. The delineation of development areas in the St Andrew & East Fife Draft Local Plan has taken full account of the landscape and other service issues.

Action:

A number of changes have been made to the strategic housing allocations as detailed in the Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Supports Fife Council identifying St Andrews as a select tourist destination which also has potential for continued academic expansion. However, St Andrews can only accept fairly limited growth and demand will have to be accommodated elsewhere.

Response:

Support noted. It is considered however, that St Andrews has scope to accept some new development; the level of this has been carefully considered.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Fife Matters identifies Guardbridge as a strategic location for Medium-scale growth. Numbers identified given in range 750-1,000. This approach is imprecise and could hinder delivery of essential infrastructure. As Fife Council is promoting growth, the figure should be revised to the higher end of the scale. Guardbridge currently meets the requirements set out in Fife Matters Policy SS1.

Response:

Leuchars/Guardbridge is identified in the Finalised Structure Plan as a Strategic Land Allocation for 400 new houses . The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan which identified 750-1,000 houses over the same period. This change has been made in response to comments received on the draft Plan.

Action:

Reduce Tay Bridgehead housing allocation from 750-1,000 to 500 units in the Finalised Plan.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Fife Council is placing an over-reliance on brownfield land and small windfall sites to contribute to the effective housing land supply. No certainty this type of site can be delivered and sites in villages may have infrastructure constraints.

Response:

Disagree. The overall windfall contribution over the Structure Plan period has been conservatively set at 160 units per annum, a level equivalent to less than half of recent windfall completions. There is enough flexibility within the housing land supply to ensure delivery of sufficient sites in accordance with Structure and Local Plan policies.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Density

Comment:

Draft Plan Policy H8 is too prescriptive. Level of detail more appropriate to Local Plans. Densities should also be based on merits and characteristics of individual sites.

Response:

Finalised Plan Policy H6 (Draft Plan Policy H8) seeks to secure efficient and sustainable use of land for residential development. Local Plans will provide more detailed guidance on this issue.

Action:

Changes have been made to Finalised Plan Policy H6 in response to comments received.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Commonly accepted that developers will have to meet some of the inevitable infrastructure costs for large-scale developments. Whilst approach is promoted by Government and re-iterated in Fife Matters in Policy DC1, in order to achieve development, contributions must be realistic and relate to the scale of the development. A more realistic approach must be taken to ensure development proposals come forward. Fife Council must accept the residual value of land and if all elements of gain are to be met it may well discourage landowners to proceed with sale.

Response:

Finalised Structure Plan sets strategic Policy approach. Detailed discussions will follow once the process has been advanced via Area Local Plans, Master Plans and development briefs.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

St Andrews HMA has a requirement in excess of 25% (as per PAN 74) and Structure Plan Policy is contrary to this guidance. In addition, Local Housing Strategy and Housing Needs Study which provides justification for affordable housing policy are not yet available.

Response:

The percentage requirement for the St Andrews HMA has been reviewed in the light of the updated Housing Needs and Affordability Study and the publication of PAN 74. The requirement is now consistent with PAN 74. The Local Housing Strategy for Fife was published in 2004 and the updated Housing Needs and Affordability Study was and is available on request.

Action:

Review percentage requirement for the St Andrews HMA in the light of PAN74.

Nathaniel Litchfield and Partners, Per George Wimpey David Wilson Homes Thomas Mitchell, Hepburn, Michael - Newcastle Upon Tyne

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

As National Planning Guidance requires consistency through the Development Plan process, this should be reflected in Fife Matters by confirming that the Local Plan sites are still defined as the appropriate area for the Glenrothes SDA.

Response:

Glenrothes is identified in the Finalised Structure Plan as a Strategic Land Allocation. A further 900 new houses are proposed at Glenrothes East over the next 20 years. The Kirkcaldy and Mid Fife Local Plan will identify specific sites to meet this need. The allocation of 900 houses is a reduction from the consultative draft Structure Plan which identified 2,450 houses over the same period.

Action:

Housing allocation for Glenrothes East reduced from 2,450 to 900 new houses in the Finalised Structure Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The strategy of providing Strategic Development Areas to create mixed communities in a carefully planned manner is supported as an appropriate means to achieve growth in a sustainable way. However, Fife Matters should be more proactive through confirming sites identified in Glenrothes Area Local Plan as the appropriate location for Glenrothes SDA.

Response:

Support noted for strategy. The detailed delineation of areas to be developed is a role for the Area Local Plan. The detailed sites will be identified in the new Kirkcaldy and Mid Fife Local Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Glenrothes

Comment:

Shortfall of housing land in existing development plan framework should be reaffirmed in Fife Matters together with policy support for early implementation of Glenrothes SDA.

Response:

Further consideration has been given in finalising the Plan to the strategic housing land allocations. The strategic land allocation has been reduced at Glenrothes to reflect the additional supply now proposed at Kirkcaldy East to assist in delivering key strategic infrastructural improvements for Mid Fife and the significant capacity within the urban area for housing development. The strategic allocation for Glenrothes is to Glenrothes East.

The emerging new Kirkcaldy and Mid Fife Local Plan will identify the specific sites to meet the strategic land allocation together with other sites.

Action:

Strategic land allocation reduced to 900 at Glenrothes East.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Glenrothes

Comment:

Objectives for Glenrothes town centre and surrounding communities supported as it is considered that the appropriate development of the Glenrothes SDA will enable their delivery.

Response:

Support noted.

Action:

Strategic land allocation reduced to 900 at Glenrothes East.

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Glenrothes

Comment:

It is considered a single site SDA for Glenrothes would ensure an efficient layout maximising opportunities to utilise public transport and minimising amount of infrastructure and land to deliver SDA which is consistent with SPP3. Partial development of the SDA, via two or three sites would result in a more complicated delivery process.

Response:

Noted.

Action:

Strategic land allocation reduced to 900 at Glenrothes East.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Support Policy DC1 and strategy of establishing principles of developer contributions through Structure Plan prior to providing details of requirements in a Local Plan.

Response:

Support welcomed.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Draft Plan Policy DC2 simply lists development contributions associated with each SDA, without supporting information relating to delivery of contributions. Draft Plan Policy DC2 is inconsistent with approach established in Circular 12/96 and Draft Plan Policy DC1. Draft Plan Policy DC2 should be deleted or supplemented by detailed justification for developer requirements.

Response:

Finalised Structure Plan sets strategic Policy approach. Detailed discussions will follow once the process has been advanced via Area Local Plans, Master Plans and development briefs. Finalised Plan Policy DC1 and Proposal DC1 provide details at an early stage in the planning process to both assist the development industry and provide clarity in terms of requirements.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Draft Plan Policy DC2 does not mention local retail facilities and services to address convenience needs of SDA community. Inclusion of such facilities essential to a successful sustainable community, whilst protecting character of nearby centres.

Response:

Agreed that small shops are important in the planning of new communities within large expansion areas. The purpose of Finalised Plan Proposal DC1 (Draft Plan Policy DC2) is not to cover everything that will be required, but to set out what are the key strategic requirements. The details of retail and other facilities will be addressed via Area Local Plans, Master Plans and development briefs.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Draft Plan Policy H5 states Mid Fife sites will be required to make a contribution of 25% of their capacity. However Fife Matters para 3.39 states whilst there is an established need in West and East Areas no additional requirement has been identified for Mid Fife. Considers best means of delivering affordable housing in Mid Fife would be as part of a detailed regeneration strategy, identifying specific areas in need of refurbishment, demolition or replacement. Consequently, the inclusion of a blanket requirement of 25% affordable housing on all developments in Mid Fife, including SDAs, is inappropriate and would not address the specific problems relating to affordable housing in Mid Fife.

Response:

Since the preparation of the Consultative Draft Structure Plan, an updated Housing Needs and Affordability Study has been undertaken. This identified a need for about 1,000 new affordable houses in the Kirkcaldy Housing Market Area. Percentage requirements have been revised in light of the study and the publication of PAN 74.

Action:

Revise percentage requirements in Finalised Plan Policy H4 (Draft Plan Policy H5).

The Barton Willmore Planning Partnership, Per Boyack Homes, Clarke, Phillip - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The strategy objective to grow Fife's economy and population is supported in principle.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Whilst supporting the Strategy, it is considered that the intention to guide inward migration to Mid Fife to assist regeneration ignores the suitability, scope, capacity and market potential of St Andrews and East Fife area to accommodate development. Increasing the provision for development in St Andrews and East Fife will assist the stated strategy objective to provide a choice of quality housing, as well as providing for a choice of different locations.

Response:

Finalised Structure Plan does not ignore the scope for development in St Andrews and East Fife. See Finalised Plan Proposal H2.

Action:

Revised strategic land allocations for St Andrews and East Fife set out in Finalised Plan Proposal H2.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

In Mid Fife it is questionable whether growth of the scale envisaged for Lochgelly or Levenmouth is achievable in terms of market demand. In contrast, the scale of growth identified for St Andrews and East Area is inadequate. The housing market East Fife is currently subject to severe constraints of quality and restrictive land locations. Acknowledgement and removal of these constraints would allow East Fife to contribute to the stated strategic objectives.

Response:

It is considered that both Lochgelly and Levenmouth have the potential to benefit from housing and employment land provision. Two SDAs, Cupar and St Andrews, have been identified East Fife.

Action:

Revise Finalised Plan Proposals H1 and H2.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The identification of Cupar for further development and long-term growth through the Local Plan and the Area Transport Plan is supported.

Response:

Support noted.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Draft Plan Policy DC1 should be modified in accordance with the principles guiding Developer Contributions set out in Circular 12/1996 by deletion of the first sentence.

Response:

Finalised Structure Plan sets strategic Policy approach. Detailed discussions will follow once the process has been advanced via Area Local Plans, Master Plans and development briefs. Finalised Plan Policy DC1 and Proposal DC1 provide details at an early stage in the planning process to both assist the development industry and provide clarity in terms of requirements.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Draft Plan Policy DC2 is excessive in the context of the principles in Circular 12/1996 and should be deleted.

Response:

Finalised Structure Plan sets strategic Policy approach and is not considered to be excessive. Detailed discussions will follow once the process has been advanced via Area Local Plans, Master Plans and development briefs.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

In accordance with SPP2 and SPP3, the Finalised Structure Plan, through Proposal PE1 should reassess long standing employment allocations for re-allocation and re-development for other uses. This should be carried out on a site-specific basis through the replacement of local plans.

Response:

Finalised Plan Proposal PE1 has been revised from the Draft Plan version. A further process of assessment will be undertaken as suggested, via the Local Plan process.

Action:

Revise Finalised Plan Proposal PE1.

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

The draft plan contains no explanation of specific allocation of housing requirements as set out under Policy H2 and accompanying Schedules H2 and H3. It is not evident that detailed consideration has been given to viability of development and infrastructure and service thresholds.

Response:

Detailed evaluation of sites has been undertaken and is published with the finalised Structure Plan as Proposal H2. The specific allocation of land for future development is a function for the Local Plan process. Full account has been taken of the important requirements and this will be addressed in detail via Local Plan, Master Plans and development briefs.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Draft Plan Policy H5 as drafted is inappropriately detailed for inclusion in the Structure Plan. It should be deleted and replaced by a short policy statement of the Council's intention to facilitate the provision of affordable housing to meet needs as demonstrated by housing needs assessment in the preparation of Local Plans.

Response:

Disagree. Affordable housing is a strategic issue in Fife requiring a strategic but detailed policy.

Action:

Draft Plan Policy H5 revised and renumbered Finalised Plan Policy H4.

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Not withstanding that Draft Plan Policy H5 should be modified as indicated, the percentage requirements stated in the draft policy are all substantially in excess of the 25% benchmark in the recently issued Planning Advice Note 74.

Response:

PAN 74 was published after the Consultative Draft Structure Plan was approved. The percentage requirements have been revised in the light of PAN 74 and the updated Housing Needs and Affordability Study. They are be consistent with PAN 74. Draft Plan Policy H5 now Finalised Plan Policy H4.

Action:

Review percentage requirement.

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Draft Plan Policy H7 should comprise of only the first sentence of the policy as it is currently worded; alternatively the word "may" in the second sentence should be deleted and replaced with the word "will" to provide the required precision and clarity. The second bullet point could be deleted as over-allocation in Mid Fife is promoted in the development and settlement strategies.

Response:

Suggestions noted. Policy H5 of the Finalised Structure Plan (Draft Plan Policy H7) seeks to ensure that there is at least a 5-year effective housing land supply available in each Housing Market Area at all times to meet the Plan's requirements. The reference to Mid Fife has been deleted as suggested. Finalised Plan Policy H3 addresses the phasing of residential development in a planned way to ensure a 5-year land supply at all times.

Action:

Amend Finalised Plan Policy H5.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Density

Comment:

Draft Plan Policy H8 is excessively detailed for inclusion in the Structure Plan and should be deleted. Alternative policy wordings similar to that of the approved Fife Structure Plan 2002 should be applied.

Response:

Finalised Plan Policy H6 (Draft Plan Policy H8)seeks to secure efficient and sustainable use of land for residential development. Local Plans will provide more detailed guidance on this issue.

Action

Changes have been made to Finalised Plan Policy H6 in response to the wider comments raising concern in respect of the consultative draft policy.

RPS, Per Henderson Surveyors, Salter, Bob - Leith, Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Whilst the settlements of Mid Fife provide key locations for both inward investment and new local business development with a supply-led approach, Cardenden is not specifically referred to in either Draft Plan Schedule H2 or H3. Cardenden offers the opportunity to create a strategic transport node based on the relocation of the existing rail station and the creation of a transport interchange with Park and Ride facility. To secure the scale of regeneration required at Cardenden the level of private investment needs to be substantial. This requires a scale of land released equivalent to a Strategic Development Area.

Response:

Development in the Cardenden area has been considered but other areas in Mid Fife are more consistent with the strategy of the Finalised Structure Plan and are identified in Finalised Plan Proposal H2.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Policy SS1 refers to development taking place within settlements. For the purpose of clarity, the word "settlements" could be deleted and replaced with defined settlement boundaries in the Local Plan.

Response:

Settlements equate to areas within defined settlement boundaries defined in Local Plans.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Policy SS1 states "avoiding damage to built heritage or natural environment features". The word "damage" should be deleted as it is a subjective term and creates the opportunity for conflict over its definition. It should be replaced with "avoiding an unacceptable detrimental impact".

Response:

Disagree. Consider word "damage" allows account to be taken of the degree of impact and sets an acceptable limit. Using the word "unacceptable" raises issues of who sets the benchmark of acceptability.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

The comment in Draft Plan Para 3.3 is considered to be contrary to the guidance contained within Circular 12/1996. All developer contributions should relate in scale and kind to the development proposed. The words "all that is" should be deleted and replaced with "contributions in scale and kind towards infrastructure facilities".

Response:

Finalised Structure Plan sets strategic Policy approach. Detailed discussions will follow once the process has been advanced via Area Local Plans, Master Plans and development briefs. Finalised Plan Policy DC1 and Proposal DC1 provide details at an early stage in the planning process to both assist the development industry and provide clarity in terms of requirements.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

With regard to Draft Plan Para 3.4 it is expected that developers will be expected to contribute to the provision of community infrastructure requirements generated by the development. This statement contradicts the Council's later commitment to partnership working and Draft Plan Para 3.5. The requirement for no cost to fall to the public purse is inflexible and would hinder creative solutions, particularly those which have a wider benefit than serving just a specific development. Para 3.4 should be amended to accommodate the principle of partnership working and allow for more flexibility.

Response:

The statement in text refers to the cost of provision of infrastructure. However, it should be noted that community infrastructure has two elements, the physical fabric of the facility and the staffing/running costs. The former would be provided by the developer, the latter by other agencies including Fife Council.

Finalised Structure Plan sets strategic Policy approach. Detailed discussions will follow once the process has been advanced via Area Local Plans, Master Plans and development briefs. Finalised Plan Policy DC1 and Proposal DC1 provide details at an early stage in the planning process to both assist the development industry and provide clarity in terms of requirements.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

The statement "contributions will also be sought for other community deficiencies" in Draft Plan para 3.4 should be deleted as the requirement for contributions for off-site or unrelated community facility deficiencies can be secured through discussion between the developer and the Council. Planning agreements require, under planning legislation, to be related in nature, scale and kind to the proposed development.

Response:

The text has been slightly amended, however it does recognise that planning gain in appropriate circumstances will be discussed in addition to the requirements being provided for in bringing forward a development by the developer.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

The term "and its surroundings" in Draft Plan Policy DC1 should be deleted. The Council should not require a developer to mitigate adverse impacts of the surroundings of a development. The wording of this policy should be revised.

Response:

The developer is required to ensure that their proposals do not have adverse impacts on the development's surroundings. Finalised Plan Policy DC1 revised to deleted reference to "and its surroundings".

Action:

Revise Finalised Plan Policy DC1.

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Draft Plan Policy H5 should be amended to take account of and be consistent with PAN 74.

Response:

PAN 74 was published after the Consultative Draft Structure Plan was approved. It has been taken into account in the Supplementary Guidance for affordable housing and in the Finalised Structure Plan. Draft Plan Policy H5 now Finalised Plan Policy H4.

Action:

Change Finalised Plan Policy H4.

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Draft Plan Policy H5 refers to 30% affordable housing across Fife. This should be amended and separate requirements for each Housing Market Area identified, building on the areas already identified. This will relate to the requirement to local needs.

Response:

Finalised Plan Policy H4 (was H5) does split this overall requirement for each of the 4 housing market areas. In the Dunfermline and Kirkcaldy HMAs additional local variations are also identified. This approach is taken in the Finalised Structure Plan and Supplementary Guidance.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The site threshold in PAN 74 is 20 units in urban areas and this should be adopted by Fife Council.

Response:

Agreed. PAN 74 was published after the Consultative Draft Structure Plan was approved. The Finalised Structure Plan and Supplementary Guidance now reflect the guidelines on thresholds in PAN 74. Draft Plan Policy H5 now Finalised Plan Policy H4.

Action:

Change Finalised Plan Policy H4.

RPS, Per Ogilvie Homes Bett Homes, Neaves, Philip - Leith, Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The Structure Plan should direct Local Plans to bring forward land to reduce shortfalls in the period 2006 to 2011.

Response:

Disagree. Policy H3 of the Finalised Structure Plan addresses the phasing of residential development to ensure an appropriate land supply. The annual Housing Land Audit monitors the take up of sites and will identify the need for review of the housing land requirement as necessary.

Action:

No Change.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The word "following" should be deleted from Draft Plan Policy H1 as Schedule H1 contains the areas identified to meet the requirement and they do not follow this policy.

Response:

Comment relates to wording of Draft Plan Policy H2. Agree with suggested deletion.

Action:

Draft Plan Policy H2 not carried forward into Finalised Plan.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Schedule H2 should be amended to increase the scale of provision for St Andrews and East Fife in the periods 2011-2016 and 2016-2021 and promote sufficient flexibility. Recommend for flexibility to add a 40% allowance in terms of output, which would allow the Council to release development opportunities concurrently to deliver integrated proposals and secure infrastructure and community benefits.

Response:

Proposals H1 and H2 of the Finalised Structure Plan allow for adequate flexibility of supply and Finalised Plan Policy H3 ensures that phasing will be managed to deliver supporting infrastructure. Proposal DC1 lists developer requirements for Strategic Land Allocations, supported by Policy DC1.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Support for the Draft Plan's approach in Policy H4 and Policy H7.

Response:

Support noted. Policies renumbered H3 and H5 in Finalised Plan.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Draft Plan Policy H5 should be amended to reflect PAN 74 and restrict affordable housing contributions to levels envisaged by PAN 74.

Response:

PAN 74 was published after the Consultative Draft Structure Plan was approved. It has been taken into account in the Supplementary Guidance for affordable housing and in the Finalised Structure Plan. Draft Plan Policy H5 now Finalised Plan Policy H4.

Action:

Change Finalised Plan Policy H4 (previously H5).

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The Plan should make clear that it will identify key locations and sites that can have a strategic impact on delivery of medium and large-scale requirements to address the shortfall in housing land. These could comprise sites that are ready and capable of development, such as Henderson's Meadow, Leuchars.

Response:

Leuchars/Guardbridge is identified in the Finalised Structure Plan as a Strategic Land Allocation for 400 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-1,000 houses over the same period. This change has been made in response to the comments received on the draft Plan. Identification of specific sites is a matter for the St Andrews & East Fife Local Plan and will be considered in this context.

Action:

Housing allocation reduced from 750-1,000 to 400 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The critical issue facing the draft Structure Plan is to reduce the shortfall of housing land as the Council is legally obliged to have a 5 year supply of housing land at all times. Structure plans should make it clear that it will identify key locations and sites which have a strategic impact on delivery of medium and large scale requirements to address the shortfall. They should comprise sites which are ready and capable of development such as Henderson's Meadow at Leuchars which would contribute to the housing shortfall for a number of specified reasons.

Response:

The detail of housing land allocations is not a Structure Plan issue and is more properly addressed by the St Andrews & East Fife Local Plan. Comment will be considered in this context. Proposal H2 of the Finalised Structure Plan gives an indication of the locations and approximate scale of Strategic Development Areas and Other Strategic Land Allocations. Local Plans will give detailed consideration to the scale and siting of such development, subject to monitoring and review as necessary.

Action:

RPS, Per Taylor Woodrow, Salter, Bob - Leith, Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Policy SS1 refers to development taking place within settlements. For purposes of clarity the word 'settlement' should be deleted and replaced with defined settlement boundaries in the local plan.

Response:

Policy SS1 is clear in that it provides guidance for the delineation of new settlement boundaries in Local Plans to take account of development land requirements.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Policy SS1 states avoiding damage to built heritage or natural environment features. The word 'damage' should be deleted as it is a subjective term and creates the opportunity for conflict over it's definition. It should be replaced with 'avoiding unacceptable detrimental impact'.

Response:

Disagree. Consider word "damage" allows account to be taken of the degree of impact and sets an acceptable limit. Using the word "unacceptable" raises issues of who sets the benchmark of acceptability.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

The contents of para 3.3 are contrary to the guidance contained in Circular 12/1996. Developers should not be required to fund all that is required to bring forward that development as this could be infra-structure that is required for the wider community associated with more than one proposal. All developer contributions should relate in scale and kind to the development proposed. The words 'all that is' should be deleted from paragraph 3.3 and replaced with 'contributions in scale and kind towards infrastructure facilities'.

Response:

Finalised Structure Plan sets strategic Policy approach. Detailed discussions will follow once the process has been advanced via Area Local Plans, Master Plans and development briefs. Finalised Plan Policy DC1 and Proposal DC1 provide details at an early stage in the planning process to both assist the development industry and provide clarity in terms of requirements.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Although it is expected that developers will be expected to contribute to the provision of community infrastructure requirements generated by their development, the statement in paragraph 3.4 contradicts the Council's latest commitment to partnership working, stated in paragraph 3.5..

Response:

The statement in text refers to the cost of provision of infrastructure. However, it should be noted that community infrastructure has two elements, the physical fabric of the facility and the staffing/running costs. The former would be provided by the developer the latter by other agencies including Fife Council.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

The requirement for no cost to fall on the public purse is inflexible, and would hinder creative solutions, particularly those which have a wider benefit than serving just a specific development. Paragraph 3.4 should be amended to accommodate the principle of partnership working and allow more flexibility.

Response:

The Council does clearly set out a strong partnership approach to delivering the Plan's strategy. The statement referred to is considered appropriate.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

The statement "contributions will be sought for other community deficiencies" in para 3.4 should be deleted as the requirement for contributions for off-site or unrelated community facility deficiencies can be secured through discussion between developers and Council. In addition, planning agreements require, under planning legislation, to be related in nature, scale and kind to the proposed development.

Response:

The text refers to those items required to service new development and may include provision on a pro-rata basis. Finalised Structure Plan sets out the strategic Policy approach. Detailed discussions will follow once the process has been advanced via Area Local Plans, Master Plans and development briefs.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

The term "and all its surroundings" in Policy DC1 should be deleted. The Council should not require a developer to mitigate adverse impacts in the surroundings of a development.

Response:

The developer is required to ensure that their proposals do not have adverse impacts on its surroundings. Delete reference to surroundings in Finalised Plan.

Action:

Finalised Plan Policy DC1 reworded to delete reference to surroundings.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Schedule H1 shows an estimated shortfall of 5,380 units for Dunfermline & West Fife from a total requirement of 9,200 units for the period 2006-2026. For the period 2006-2011, there is a requirement of 2,300 units in Dunfermline and West Fife. There is, however, no identified shortfall. This should be clarified.

Response:

The shortfall is calculated on the basis of the housing land requirement less supply. Where the housing land supply is sufficient to meet the housing land requirement for a given period, there is no shortfall. The Report of Survey gives further detail of how the housing land requirement is derived. The Finalised Plan Proposal H1 indicates the housing land requirements.

Action:

Finalised Plan Proposal H1 shows most up-to-date requirements.

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The word "following" should be deleted from Policy H1 as Schedule H1 contains the areas identified to meet the requirement and they do not follow this policy.

Response:

Comment relates to Policy H2. Agree with suggested deletion.

Action:

Draft Plan Policy H2 not carried forward into Finalised Plan.

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Schedule H2 should be amended to increase the scale of provision in the periods 2011-2016 and 2016-2021 and promote sufficient flexibility. Recommend for flexibility to add a 40% allowance in terms of output, which would allow the Council to release development opportunities concurrently to deliver integrated proposals and secure infrastructure and community benefits.

Response:

Proposals H1 and H2 of the Finalised Structure Plan allow for adequate flexibility of supply and Finalised Plan Policy H3 (Draft Plan H4) ensures that phasing will be managed to deliver supporting infrastructure. Proposal DC1 lists developer requirements for Strategic Land Allocations, supported by Policy DC1.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Support for the Plan's approach in Draft Plan Policy H4 and Policy H7 regard to phasing of sites and ensuring flexibility.

Response:

Support noted.

Action:

Draft Plan Policies H4 and H7 renumbered H3 and H5 respectively in Finalised Plan.

Comment No: 12

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Draft Plan Policy H5 refers to 30% of affordable housing across Fife. Draft Plan Policy H5 should be amended to take account of and be consistent with PAN 74 and set out separate requirements for each Housing Market Area, building on areas already identified. This will roll out requirement to local needs. Given the surplus of affordable housing in West Fife, as stated in the local housing strategy, a requirement for 30% affordable housing units is excessive and this should be no more than 25%.

Response:

Finalised Plan Policy H4 (was H5) and Policy AH1 of the Supplementary Guidance on Affordable Housing) now take into account the provisions of PAN 74, setting out the requirement by housing market area. The results of the updated Housing Needs and Affordability Study have been taken into account in setting the percentage requirements for West and Mid Fife.

Action:

Change Finalised Plan Policy H4.

Comment No: 13

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The site size threshold in PAN 74 is 20 units in urban areas - this should be adopted by the Council.

Response:

Agreed. PAN 74 was published after the Consultative Draft Structure Plan was approved. The Finalised Structure Plan and Supplementary Guidance now reflect the guidelines on thresholds in PAN 74. Draft Plan Policy H5 now Finalised Plan Policy H4.

Action:

Change Finalised Plan Policy H4.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

With regard to Draft Plan Proposal PT2, the Linburn Link Road should be identified as a regional connectivity route. The Linburn Bypass is a strategic scheme safeguarded in the Dunfermline and Coast Local Plan adopted in April 2002 to relieve existing traffic conditions on Halbeath Road and to enable improved connections to the north and west of Dunfermline. This road is fundamental to achieving the growth aspirations of Dunfermline to the north, west and southwest.

Response:

The issue has advanced to route delineation in the Local Plan and should be progressed via the Local Transport Strategy.

Action:

DTZ Pieda Consulting, Per Kingslaw Park Limited, Sorrell, Jim - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Whilst Policy SS1 requires development to be focused within existing settlements subject to infrastructure constraints which run parallel with the ambition under para 2.5 for strategic development areas across Fife, centred in Mid Fife, and as referred to by Policy SDA1. This stepped land release should be greenfield areas. However para 3.2 requires a focus on brownfield land where possible and this is the case with Kingslaw as it is a coal extraction site. This considered clarification is required to make the policy allow for the use of brownfield land.

Response:

Mineral extraction sites, where there is an obligation to restore the surface to agriculture or some other planned land use, cannot be considered to be brownfield land.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The Kingslaw site is specifically referred to in Fife Matters only as a preferred employment opportunity for Kirkcaldy East. The Action Plan refers to required works which are closely associated with the site and matters addressed in the extant planning consent. Other sites in the area may also be included. However, ground stability problems from past coal mining present fundamental and costly development constraints, but these are currently being addressed at Kingslaw through open casting. It is therefore considered that priority is justified for early development for the Kingslaw site for alternative uses and that a specific reference to a mixed use development including houses is merited.

Response:

The proposed uses for the Kingslaw area are those set out in the Approved Fife Structure Plan 2002.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Draft Plan Policy DC2 lists the developer requirements anticipated for each of the Strategic Development Areas and it is noted from Draft Plan Policy DC1 that development contributions will be sought to address any adverse impacts and shortfalls on community infrastructure caused by development, with contributions relating to the scale of impact. Provided that this is done on a fair and equitable basis, this approach is welcomed. There is however concern that the first developer in an area may have to provide facilities that will be able to be used by subsequent developers. It is suggested that a system of shared developer funding should be established to prevent the full burden resting with the first developer.

Response:

Support for developer contributions of a fair and equitable basis noted. Finalised Plan Policy DC1 and Proposal DC1 provide detailed information. The issue of funding to cross development threshold and the scale of provision in relation to long term area development requires detailed considerations on an area by area basis which will be addressed via Area Local Plan, Master Plans and development briefs.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

The scale of development for the SDA area Northeast Kirkcaldy/Kingslaw of 50 hectares for business use is possibly excessive and the area should be revised from 50 hectares to 25 hectares. Although it is considered that the upper level is likely to be unsustainable, as it is considered that an analysis of supply and demand for employment land in Fife and Kirkcaldy concludes there is a considerable over supply.

Response:

The Finalised Structure Plan takes forward the proposals in the approved Fife Structure Plan 2002. The area has now been reduced to 40 hectares. The allocation is for a period of 20 years and would be subject to review during the life of the Plan.

Action:

Reduce Kingslaw/East Kirkcaldy area to 40 hectares.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

An allowance for multiple business uses at the John Smith Business Park is justified although a single user could be accommodated if demand is identified.

Response:

Noted.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The timescales of the finalised Structure Plan and the revised local plan for Mid Fife must be compatible to enable the local authority and developers to progress the development process in a co-ordinated manner. Developer requirements and timescales for implementation must realistically match the ability of developers to subscribe to these requirements. Sufficient houses and higher value uses should be allocated to Kingslaw to justify this.

Response:

Comments noted. The pre-draft consultation for the Kirkcaldy and Mid Fife Local Plan is underway, with the draft Plan programmed for March 2007. Detailed issues of land allocation will be addressed through the Local Plan and an integrated and phased masterplan prepared in consultation with local communities, landowners and stakeholders. Kirkcaldy East is identified in the Finalised Structure Plan as a Strategic Development Area, allocated for 2,500 houses. This allocation is an increase from the consultative draft Structure Plan that identified 1,750 houses over the same period. This change has been made in response to the comments received on the draft Plan.

Action:

Housing allocation at Kirkcaldy East increased from 1,750 to 2,500 in the Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The level of affordable housing requirement for Kirkcaldy East area should be considered in the light of recent planning advice contained in PAN 74 and the covering letter attached to the document. In this instance, the Draft Plan sets no requirement for affordable element in Kirkcaldy East and we consider this is justified by the market level of the existing housing in the area.

Response:

Since the approach of the Consultative Draft Fife Structure Plan, an updated Housing Needs and Affordability Study has been undertaken and PAN 74 published. In the light of these and the public consultation, the percentage requirement for the Kirkcaldy area has been revised. Draft Plan Policy H5 now Finalised Plan H4.

Action:

Change Finalised Plan Policy H4.

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

The scale of development proposed at Kirkcaldy East will create a new community and there is merit in targeting a design, and inclusion of other land uses that will sustain an urban village. This should include an appropriate level of retail units for both convenience and comparison goods. In these instances Policies S1and S2 should be set aside, to meet local demand. Similar provisions should be made for local leisure facility provision and Draft Plan Policy E4 amended accordingly.

Response:

Overall Structure Plan strategy should still apply, including Policies S1 and S2. The policy framework, as amended, provides for all new retail proposals. Detailed issues of land use allocation will be addressed via the Area Local Plan, Master Plans and development briefs.

Action:

Draft Plan Policy E4 moved to Area Local Plans.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

There currently remains considerable uncertainty as to the Council's preferred transport agenda and it is understood that studies are presently being completed to inform future decisions. It is vital that a clear guide is provided at the earliest possible opportunity as to which transport infrastructure is required.

Response:

The Action Plan (which can be viewed on www.fifedirect.org.uk/development plan) sets out the major transport infrastructure requirements of the Finalised Structure Plan. The Local Transport Strategy sets out Fife Council's transport agenda, which is delivered through it's Area Transport Plans.

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

It is noted that a primary school is included in the developer requirements set out in Policy DC2 of Draft Plan and this could be factored into the development analysis of the Kingslaw site.

Response:

Noted. The issue of the provision of new facilities such as schools will be addressed via Area Local Plans, Master Planning and development briefs of the area allocated for residential purposes. Fife Council is committed to the delivery of education services for the whole of Fife. School capacity will be provided timeously to meet the planned growth in population.

Action:

Policy DC2 replaced by Proposal DC1 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

The Council should provide clear guidance as soon as practicable on the following issues:- a decision on formal Council preference for north loop road and associated upgrade on the Redhouse junction as the preferred East Fife link; need for a second rail halt for Kirkcaldy, it's locational preference if at Kingslaw and thus the scope for transport interchange within the site; scale of developer contributions anticipated in the extent of cost-sharing within South Glenrothes, Dysart, Levenmouth and Kirkcaldy West; preferred transport links; scope of a transport interchange; road infrastructure; and, clarification of educational requirements.

Response:

Many of the issues involve a number of agencies including the Scottish Executive and more detailed evaluation at the Area Local Plan, Master Plan and development brief stages. The Council is progressing further studies in respect of key strategic infrastructure in this area.

Action:

GVA Grimley, Per Ominvale Limited (Wellwood), McCafferty, Andrew - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

A 5.67 hectare site at Wellwood, to the North of Dunfermline, should be included within the boundaries of the Dunfermline strategic location and should be developed for residential use.

Response:

Noted. This is not a Structure Plan issue. The Dunfermline & West Fife Local Plan will define the boundaries of the Dunfermline Strategic Development Area and a masterplan will be prepared in consultation with local communities, landowners and stakeholders.

Action:

GVA Grimley, Per Omnivale Limited (Lochgelly), McCafferty, Andrew - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Lochgelly

Comment:

In accordance with the masterplan submission by Messrs Omnivale Ltd.

Response:

Noted.

Action:

Muir Smith Evans, Per Holland Park, Evans, Robert - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

In the terms of Draft Plan Policy H5 there should be acknowledgement that different forms of housing can provide more affordable homes that reflect particular market considerations. It should also be recognised that the levels of affordable housing are set as an aspiration not as a fixed standard or minimum and individual proposals should be assessed on their own merits in different locations across the Structure Plan area. In addition, even within single housing market areas there will be significant differences. It should therefore be recognised that the level of affordable housing provision required should be based on the type of housing proposed and it's value.

Response:

Consider that the policy does acknowledge the broad range of tenures. Detailed information is provided in the Supplementary Guidance. It is important that a consistent framework is put in place to promote provision of affordable housing. That said, there is scope to recognise exceptional circumstances. The type of provision sought will be based on identified local needs. Site value will be taken into account. Draft Plan Policy H5 now Finalised Plan Policy H4.

Action:

Amend Finalised Plan H4.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Settlements within housing market areas have different characteristics. Even within larger settlements there will be areas of different nature and densities. The provision of off-site housing can be a legitimate means of securing provision where it is most suitable.

Response:

SPP3 emphasises the importance of the housing market area in meeting identified need and the Finalised Structure Plan and Supplementary Guidance are consistent with this It is not practical to provide information for every individual settlement in Fife. However, in Mid Fife, where housing need is particularly complex, locality areas have been used. Off site provision is appropriate in same circumstances but Fife Council's clear preference will be for on-site provision.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The provision of infrastructure within the community benefits such as open space, landscape structure on new roads can have a wider positive effect and serve more than just the development role. The requirement for affordable housing should recognise where there are demonstrable community benefits in new developments.

Response:

Whilst the provision of infrastructure can indeed have wide community benefits it is important that any identified need for affordable housing is met as locally as possible and is tied back to the level and nature of that need. Where there is an identified need for affordable housing, this is a legitimate requirement if set out in the Development Plan.

Action:

Muir Smith Evans, Per Balgonie Estates Ltd, Evans, Robert - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Key Diagram

Comment:

The location of the Glenrothes Strategic Development Area should be to the south-east of the town, closer to the strategic employment land and the alignment of the A92 rather than shown at present on the key diagram. The amendment will reflect the identification of the Strategic Development Area as described within the written statement.

Response:

The Key Diagram is not intended to provide an exact geographical location for development proposals.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Balgonie Estates Ltd support the general settlement strategy as outlined in Chapter 2. However, it is suggested that specific reference to Glenrothes on page 15 be expanded to clarify the phasing of potential land release for housing and employment uses, and the requirement for significant new infrastructure should be explained in more detail and related to the impact of the development proposed only. There should be no requirement to upgrade or make good any existing deficiencies in provision.

Response:

Glenrothes is identified in the Finalised Structure Plan as a Strategic Land Allocation. A further 900 new houses are proposed at Glenrothes East over the next 20 years. The Kirkcaldy and Mid Fife Local Plan will identify specific sites to meet this need. The allocation of 900 houses is a reduction from the consultative draft Structure Plan which identified 2,450 houses over the same period. The Kirkcaldy and Mid Fife Local Plan is a more appropriate mechanism for detailed matters.

Action:

Housing allocation in Glenrothes area reduced from 2,450 to 900 new houses in the Finalised Structure Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Policies SDA1 and DC1 should not require all new developments to provide contributions to address any existing shortfalls in community infrastructure.

Response:

Concerns noted on Developer Contributions and on ensuring new development can proceed. Clearly identified infrastructure and facilities needs must be provided in advance of development which cannot be funded by public sources if development is to happen as planned. Should new development require a facility that is needed it could be linked on an appropriate basis.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Any developer contributions should be appropriate to and relevant to the individual proposal and should also assess the wider community benefit of essential infrastructure such as main distributor roads and structure landscaping. Whilst this may be the intention of Fife Council, it should be made clear within the text supporting Policy DC1.

Response:

Finalised Plan Proposal DC1 sets out the requirements for the major development areas. Table includes mention of strategic network improvement, which could include new distributor roads, and structural landscaping. The strategic factors are set out in the Action Plan. As work progresses in masterplanning more detailed consideration will be given to the contributions in discussion with partners.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

In terms of Draft Plan Policy H5, a clearer justification and explanation should be given on the different characteristics within Housing Market Areas and a distinction drawn between Glenrothes and Kirkcaldy; even although they lie within one Housing Market Area, they are distinct communities with different characteristics and different housing needs.

Response:

Finalised Plan Policy H4 (was H5) and the equivalent policy in the Supplementary Guidance (AH1) will be revised following the updated Housing Needs and Affordability Study. The policies now recognise variations within the Kirkcaldy Housing Market Area. In addition, revised detailed justifications are set out in the Report of Survey and Supplementary Guidance.

Action:

Changes to Finalised Plan Policy H4 and Policy AH1 of the Supplementary Guidance.

ATH Resources, Weatherall, Lee - Doncaster

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The Structure Plan fails to acknowledge the role of rural industry in general and the opencast industry in particular as being of particular importance in being able to facilitate this environmental improvement. The opencast industry has a track record of facilitating such improvements and this has been recognised in the joint Scottish Natural Heritage and Royal Society for the Protection of Birds publication on biodiversity and opencast coal

mining.

Response:

The benefits of opencast coal operations are not disputed, however, the requirement to rehabilitate a site underlain by coal is not an over-riding reason to approve otherwise unacceptable proposals.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Opencast Coal

Comment:

The opencast industry in general and the respondent in particular has a track record of, and is committed to introducing new people into the industry from the local communities in which they operate. These employees are given opportunities for training and development, which facilitate continued employment within opencast coal mining and other allied industries such as construction, hence helping to provide skills needed in achieving this vision.

Response:

Noted.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Draft Plan Policy T4 is supported in principle. However, where a disused railway network is affected temporarily, then this should not be considered as prejudicing the future of the network for potential transport use. Indeed imaginative restoration schemes within mineral developments can facilitate the use within the transport network by extending their route and linking them to other transport hubs/networks. It is therefore suggested that the word "permanent" be inserted before the word "development" within Policy T4.

Response:

Support noted. It is likely that proposals for temporary uses would be considered on their merits. Potential for imaginative restoration schemes to deliver improved transport links noted. Consider there is no need to insert the word "permanent" as suggested.

Action:

Draft Plan Policy T4 now Finalised Policy T2.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Minerals

Comment:

The statement contained in Draft Plan paragraph 4.10 is considered to be unfairly negative towards the minerals industry and should be amended. The fact that the minerals industry consumes finite resources should not be portrayed as being a negative aspect of the industry, rather this is a fact of nature. In addition the phrase 'significant adverse effects of extraction and against protection of the environment' assumes that all mineral working will inevitably result in significant adverse effects and should be removed.

Response:

It is not considered that Draft Plan is negative towards the minerals industry. Statement in Draft Plan paragraph 4.10 to be retained as paragraph 3.66 of Finalised Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Minerals

Comment:

The first two bullet points of Policy M1 are too prescriptive and presumably aimed at aggregate production where the management of exports/imports and the provision of landbanks are the concern of the planning authority. It is considered that with regard to mineral planning, it should be market forces which determine the final markets of the energy mineral resources (subject to proper environmental and development control), not planning guidance. It is suggested therefore that for coal the first two bullet points are replaced by a statement which reflects that proposals will be supported where they meet their identified national need.

Response:

Disagree. Policy M1 should be applicable to all minerals.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Minerals

Comment:

It is considered the third bullet point of Policy M1 relates only to aggregate minerals and not to coal.

Response:

Disagree. Coal is used to provide energy which could be derived from sources mentioned in bullet point three of Policy M1.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Minerals

Comment:

Policy M2 reflects negatively towards the minerals industry and the phrase contained within the policy for the disruptive nature of mineral operations should be changed and replaced with the following: "mineral operators can make a positive commitment to improving the environment of an area, in order to compensate for any loss of amenity through the contribution to a Fife minerals trust fund". It should be noted that the opencast coal industry supports, through various mineral trust funds and other vehicles, a wide range of community initiatives. The decision on how best these contributions as distributed should be made by the operator, the planning authority and local residents.

Response:

Policy M2 seeks to include a range of contributors to take account of minerals other than coal. Reworded Policy seeks to address issues of the effects on those remote from sites yet affected, for example, by additional traffic.

Action:

Reword Policy M2 *Comment No:* 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Opencast Coal

Comment:

Policy M4 is appropriate and should be supported and any changes to the proposed area of search should be the subject of public consultation. Developments outwith the area of search should also be considered, provided it can be demonstrated that the reasons for not including the area within the area of search can be satisfactorily overcome. This clause should be included in the Policy. In addition the word "also" should be inserted into the opening line of Policy M4 following the word "will" as the insertion of the word is the key to the acceptability of the second part of this policy.

Response:

Policy does not prevent applications for proposals outwith Areas of Search which will be reviewed as part of the ongoing Development Plan preparation process. The Plan process is subject to full public scrutiny. Disagree with suggested amendment.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Opencast coal mining due to it's temporary nature is not incompatible with Green Belt objectives, particularly given it's accepted role in producing diverse and valuable habitats.

Response:

The Finalised Structure Plan does not contain a policy opposing mineral extraction in any designated Green Belt. The potential impact would be evaluated in response to any specified proposals for Green Belt sites.

Action:

Atisreal, Per BAE Systems Ltd, Pearson, Euan - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The area shown in the National Planning Framework covering West and Mid-Fife, describing it as an area where the quality of the environment needs to be improved, should be reflected in the development strategy of the emerging Structure Plan.

Response:

Support for strategy on brownfield sites noted. The Finalised Plan reinforces the need for redeveloping brownfield in a manner consistent with the overall Development Plan strategy.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

BAE Systems welcomes the strategy of the Structure Plan which involves growing the population of Fife by 2026 to 370,000, with sustained growth to 400,000 by 2046.

Response:

Target in Finalised Plan Vision for 2006 is now 375,000.

Action:

Amend policy objectives.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

The Council's proposals to direct new development principally to 4 key centres, which is to be supplemented by "growth in other towns, villages and communities" is supported by BAE. However, it requires that these other settlements be identified and should include Dalgety Bay.

Response:

It is not appropriate to include a comprehensive list of such settlements and communities in the Structure Plan, which is a strategic document. The other settlements referred to in the Finalised Structure Plan will be identified via the Area Local Plans.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

BAE also welcomes the strategy's commitment to a coastal regeneration zone from Rosyth to Methil. However, the plan must recognise that brownfield regeneration opportunities are not restricted to Inverkeithing Bay, Burntisland and Methil. The strategy should broaden its support to all brownfield sites within the coastal regeneration zone, including those in Dalgety Bay.

Response:

Strategy supports principle of rehabilitation/re use of all brownfield land but this has to be achieved taking account of all the Development Plan policies.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

BAE further agrees that providing a choice of housing is an important element of the strategy including a variety of locations. Although the whole spectrum need not be provided on each individual development site, unless it is within the six Strategic Development Areas.

Response:

Support for providing a choice of housing in an updated element of the strategy is noted. The issue of detailed site planning will be addressed via the Area Local Plans.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

BAE considers that in addition to the releases in the Strategic Development Areas that the Plan should give priority to brownfield sites within settlements. It is considered that the Urban Capacity Study has failed to recognise sites in BAE's ownership which contribute to the 30% (450 units) shortfall.

Response:

The Finalised Structure Plan is supportive of redevelopment of brownfield sites within settlements. Details of sites considered to have been omitted should be forwarded to Development Services and they will be considered for inclusion in the next edition of the Urban Capacity Study.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

BAE supports the production of a comprehensive regeneration strategy for the Coastal Regeneration Zone. It considers that there should be a commitment in that strategy to encourage brownfield housing development at a medium scale, which is supported elsewhere in the Settlement Strategy. The settlement strategy should not restrict itself to supporting brownfield development to only Inverkeithing Bay and Burntisland, but must include other settlements in the Coastal Regeneration Zone, including Dalgety Bay.

Response:

Support for Coastal Regeneration comprehensive regeneration strategy noted. Finalised Plan Paragraph 2.3 makes it clear that the full strategy will be developed and all settlements in the area will be given full consideration as to their needs.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Brownfield sites with potential for development for housing should not remain undeveloped by virtue of the fact that they are not allocated in a specific Local Plan. The Structure Plan policy must allow for windfall sites, etc. to be brought forward when Local Plans are out of date, in accordance with Government policy in SPP3.

Response:

Brownfield sites in urban areas which emerge after the Local Plan is prepared would be considered for other uses and could be considered to be windfall sites. Paragraph 3.45 of the Finalised Structure Plan refers to the role of windfall sites in the housing land supply system.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Policy H1 requires local plans to identify housing sites in accordance with four 5-year periods, starting 2006. This does not accord with SPP3 which requires local plans to identify both a 5-year effective land supply and medium-term sites "from the date of adoption". There is no emerging local plan for Dunfermline & West Fife and an adopted replacement is unlikely until at least 2008. Schedule H1 should be revised in relation to Dunfermline & West Fife as follows: 2006-13 – requirement 3420, shortfall 712; 2013-2020 – requirement 3320, shortfall 2508; 2020-2026 – requirement 2460, shortfall 2160.

Response:

Comments noted. Proposal H1 of the Finalised Structure Plan sets out the Housing Land Requirement and shortfalls for the plan period. Finalised Plan Policy H3 addresses the phasing of residential development to ensure a minimum 5-year supply of land for new housing at all times.

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The suggestion that development in the Dunfermline housing market area and local plan will, outside Dunfermline, only be met in Kincardine and Inverkeithing does not provide housing choice. The Plan should welcome the development of brownfield sites in other settlements when they come forward, such as Dalgety Bay.

Response:

Within the Dunfermline and West Fife area, the Structure Plan identifies Dunfermline as a Strategic Development Area and West Villages and Inverkeithing Bay as Other Strategic Land Allocations. The balance of the housing land requirement will be identified in the forthcoming local plan as stated in Finalised Plan Policy H2, thus providing for a range of sites, including brownfield development.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

A replacement West Fife local plan will not be adopted until at least 2008. In such circumstances SPP3 expects Structure Plan policy to permit the granting of planning permission in advance. Suggests that Draft Plan Policy H3 is expanded to accommodate this.

Response:

Noted. Finalised Plan Policy H2 (Draft Plan H3) has been expanded to reflect SPP3 and the need to monitor land supply. Addition of statement "Where a significant shortfall or surplus is identified, phasing arrangements will be reviewed."

Action:

Amend Finalised Plan Policy H2.

Comment No: 12

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Brownfield Land

Comment:

BAE welcomes the importance placed on re-using brownfield land within the Draft Plan and Fife Council's acknowledgement that brownfield sites can exist in the countryside and they are not legally confined to urban areas. In addition, BAE agrees that vacant or derelict land should be "promoted for early re-development/re-use", however this should not necessarily be achieved only through local plans. Due to the importance placed on re-using brownfield land it is, however, considered inappropriate to include the fourth bullet point in Draft Plan Policy ENV2 as it is considered the statement is vague and open to wide interpretation.

Response:

Support noted. It is important to make it clear that decisions on the use of brownfield sites must be consistent with the Development Plan policies. Draft Plan Policy ENV2 is now renamed BL1 in the Finalised Plan.

Action:

Draft Plan Policy ENV2 now renamed Policy BL1 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

It is not necessary for Draft Plan Policy H5 to take an 'across Fife' approach. It is certainly not appropriate for Draft Plan Policy H5 to include provision percentages or thresholds. Government policy is for these to be included within local plans. In any event, the figures proposed do not comply with PAN 74, based on a provision of 25% of sites in excess of 20 units.

Response:

Disagree. Affordable housing is a strategic issue in Fife requiring detailed strategic policy. Percentage requirement has been adjusted in the light of PAN 74. Draft Plan Policy H5 now Finalised Plan Policy H4.

Action:

Change percentage requirements in Finalised Plan Policy H4 (was H5).

Comment No: 14

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The Structure Plan does not comply with PAN 74 as it does not calculate or display the total amount of affordable housing needed for a period of 12 years. In addition, Draft Plan Policy H5 fails to identify all the general locations where need is to be met, although Dunfermline, Cupar and St Andrews are mentioned. It is recommended that Fife Council reviews it's affordable housing policy contained in both the Plan and the draft supplementary guidance in the light of PAN 74.

Response:

The Consultative Draft Structure Plan was approved prior to the publication of PAN 74. The Finalised Plan now takes this into account, as does the Supplementary Guidance. It is inappropriate for Finalised Plan Policy H4 (was H5) to contain too much detail geographically. This role is more appropriate for Local Plans.

Action:

Amend finalised Structure Plan and Supplementary Guidance in the light of PAN 74.

T G Packe, Per Logie and Pittencrieff Estate, Packe, T G - Linlithgow

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Forecast of future housing requirements based on population forecasts should be treated with caution. There can never be certainty that these forecasts will be accurate.

Response:

The Report of Survey details the calculation of the housing land requirement and the use of population and household projections. This information is revised to reflect biennial updates from the General Register Office for Scotland (GRO(S)), and, through Structure Plan monitoring, will contribute to ensuring that the Plan remains relevant and is reviewed as necessary.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

There is a difference between necessary housing requirements to serve local communities and housing requirements for outsiders, especially commuters. It is anticipated that forecasts will include demand from outsiders and Fife Council should be strong in resisting too many new houses for that reason.

Response:

The justification for the housing land requirement is contained in the Report of Survey. This includes assessment of indigenous housing need, together with inward migration. The Structure Plan strategy aspires to increase Fife's population by 5% to support regeneration, with a focus on Mid Fife. While the Plan can pursue this strategy through an over-allocation of the housing requirement, it is outwith the remit of land use planning to determine whether new housing is bought by local people or others wishing to move to Fife.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Fife Council must be alert in recognising when development in any of its settlements has reached saturation point and that further development will result in the loss of character, amenity or peace. This is partially covered by para 3.32.

Response:

Noted. The Structure Plan identifies the broad amount and location of new housing land, with Local Plans allocating specific sites. Development Plan policies and allocations seek to ensure that new development makes a positive contribution to its surroundings and towards achieving sustainable communities.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Applaud the statement under Draft Plan para 3.32 supporting the use of brownfield sites in order to assist community regeneration. Fife Council should be aware that development of agricultural land will sterilise that land forever and there is only a finite amount of agricultural land available.

Response:

Support noted. The Structure Plan strategy aims to ensure the most sustainable use of land and through Finalised Plan Policy BL1 supports the redevelopment of brownfield sites.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Development should not be a series of housing estates. It should be gradual within existing communities and carried out in tandem with providing job opportunities in a wide range of employment sectors. In addition, schools, etc. will be important factors in considering the location of new developments.

Response:

It is intended that development will be fully planned via Local Plans, Master Plans and site development briefs. Infrastructure and service provision will be fully integrated into the process.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Paras 1.17 and 1.80 recognise the vital importance of road and rail networks but do not mention that siting of these must be carefully planned in order to minimise the visual and noise impacts. More use should be made of the natural topography and tunnels to help reduce impact.

Response:

Route planning for new road and rail infrastructure is likely to receive Environmental Impact Assessment, which would address visual and noise impact and issues of design.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Public Transport

Comment:

Improvements should be made to ensure that more people are encouraged to use public transport including, for example, additional park and ride facilities. In addition, the issue of ensuring that public transport is comfortable must be addressed.

Response:

Agreed. Fife Council Policy seeks to encourage greater use of public transport as an alternative to the car. The issue of comfortable public transport is an issue for the Local Transport Strategy and the service providers to address.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

It is important that Fife Council works in partnership with and respects the wishes of landowners as well as developers and house builders.

Response:

Agreed. See Policy SDA1 which states that masterplans will be prepared in consultation with landowners and other parties.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Built Environment

Comment:

Excellence in design, layout and landscaping of all development must be of apparent importance, even if it results in additional costs in achieving these objectives.

Response:

Agree. The Urban Design Guide provides advice on the Council's expectations within the context of the National Planning Framework.

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Leisure Facilities

Comment:

There should be plenty of open space close to all communities for people to exercise and enjoy open air.

Response:

The location and extent of open space provision will be addressed via Master Plans and Local Plans.

Action:

No Change

ID 0042

Graham Sinclair Associates, Per Pitadro Development Co. Ltd, - Broughty Ferry, Dundee

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Dunfermline

Comment:

Pitadro Development Co Ltd supports in general terms the housing allocations for Dunfermline and West Fife. They consider that there is scope for the provision of some new housing land for the period 2006-2011 in the Northwest of Dunfermline in locations which are within walking distance of Dunfermline town centre.

Response:

Support for housing allocation noted. The land allocation for the Dunfermline SDA will be identified in the Area Local Plan.

Action:

Iain Gotts Associates, Per J W Muir Group, Gotts, Iain - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

The JW Muir Group supports in principle the proposed development of a multi-modal national freight distribution facility at Rosyth. However, they urge that a wider and more comprehensive view should be taken of the use of the port area to ensure that the design siting of such a facility does not prejudice other forms of regeneration appropriate to the area - recognising that the national distribution facility has the potential to be a bad neighbour development.

Response:

Support noted. The issues mentioned would be dealt with via the Area Local Plan, Master Plans and design briefs.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

JW Muir Group are concerned that the intention to prepare a master plan for Rosyth area could delay wider regeneration, not least because there is a clear prior need to undertake market research to identify whether or in what sectors a Rosyth facility would offer competitive advantage, having regard to the scale of investment in North East England in the multi-modal shipping freight market. It is therefore considered that Draft Plan Proposal PT1 should be re-worded as follows: "In association with the preparation of a master plan, the Council will conduct market research to identify the potential of Rosyth to be developed as a multi modal national freight distribution facility. This will be given priority to ensure that complementary development of the Port area is not unnecessarily delayed".

Response:

Concerns noted. A masterplan approach is preferred to ensure that the Port of Rosyth and the waterfront are developed in an integrated manner. Draft Plan Proposal PT1 now Finalised Plan Proposal PT2.

Action:

Draft Plan Proposal PT1 now Finalised Plan Proposal PT2.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The JW Muir group supports the comprehensive regeneration of the North Forth Shore and will support the preparation of an appropriate development strategy, provided that this does not delay regeneration. In addition, the strategy should recognise that in most cases, the level desired regeneration will be difficult and costly to achieve, not least because of a history of heavy industry and in many cases the multi ownership of land. In developing this strategy it will therefore be essential to adopt a flexible approach to land use in these areas to ensure the financial viability of any development.

Response:

Support for Coastal Regeneration Zone, provided it does not delay regeneration, is noted. Financial issues will not be ignored in addressing the forward planning of this geographical area.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The JW Muir group supports the principle of Strategic Development Areas the most effective means of delivering housing and associated developments over the planned area. In view of the projected new housing requirements at St Andrews together with the stated intention to develop St Andrews as a world class destination and economic driver for the whole of Fife, St Andrews should be included amongst the Strategic Development Areas in Policy SDA1.

Response:

Support noted. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation for St Andrews reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

The JW Muir group is concerned that the developer requirements should be strictly linked to development impact and affordability and that this should be assessed on a site-specific basis adopting reasonable and sensible cost and value yardsticks. Otherwise development may be subject to prolonged delay in delivery, contrary to the intentions of the Plan. To minimise this risk and provide greater certainty, Policy DC1 should be reworded as follows: "for all new development the Council will seek contributions from developers to address any shortfalls and/or mitigate any adverse impact brought about by that development, in accordance with Circular 12/1996. Planning conditions, legal agreements and other suitable mechanisms will be used to secure appropriate developer contributions related to the scale, composition, location, cost and phasing of the development".

Response:

Finalised Structure Plan sets strategic Policy approach. Detailed discussions will follow once the process has been advanced via Area Local Plans, Master Plans and development briefs. Finalised Plan Policy DC1 and Proposal DC1 provide details at an early stage in the planning process to both assist the development industry and provide clarity in terms of requirements. Contributions will be discussed further between partners as master planning progresses.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Concern that the housing market will struggle to deliver a housing strategy which concentrates on the Kirkcaldy and Mid Fife area to the degree proposed. Delivery of the Fife housing requirement is essential but will only be achieved with a more geographically balanced strategy, which gives more prominence to Dunfermline & West Fife and St Andrews & East Fife, bearing in mind the relative strength of demand in each of these areas.

Response:

The strategy of the Plan is to focus development on Mid Fife by diverting a larger component of mobile demand to the area. It also ensures that growth in West and East Fife to meet local needs and sustain the economy is supported and managed, through identification of Strategic Development Areas and Other Strategic Land Allocations. This will be subject to monitoring and review as necessary.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

An affordable housing policy cannot be promoted in the absence of a Housing Needs Assessment and until that is published, there is neither any basis upon which to specify requirements nor to consider their appropriateness. It is therefore premature to comment on the draft policy until this information is available. The relevant policy of the Draft Structure Plan should be reviewed by the Council in the light of the Needs Assessment and taking account of both SPP3 and PAN 74. Only then will JW Muir be able to make a reasonable comment on the contents of the policy and seek confirmation that the Council will review the Affordable Housing Policy in the light of the foregoing.

Response.

PAN 74 was published after the Consultative Draft Structure Plan was approved. The Finalised Structure Plan and Supplementary Guidance on Affordable Housing have been reviewed taking into account SPP3, PAN 74, the updated Housing Needs and Affordability Study and the public consultation.

Action:

Change Finalised Plan Policy H4 (Draft Plan Policy H5).

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Density

Comment:

JW Muir Group supports the general principle of higher residential densities but seeks greater clarity in regard to exceptions. In particular, it is concerned that rigid application of the policy would materially hinder the ability of the market to address more affluent demand as reflected by larger detached properties in their own gardens. Policy wording should therefore be amended to reflect the need to provide choice in the range of housing in the Fife Housing Market.

Response:

Support noted. Finalised Plan Policy H6 (Draft Plan Policy H8) aims to provide for a range of house types and layouts. The Fife Urban Design Guide "Creating a Better Fife" gives further guidance as to how this can be achieved.

Action:

Changes have been made to Finalised Plan Policy H6 in response to the wider comments raising concern in respect of the consultative draft policy.

Bloomfields Ltd, Per General Aviation Awareness Council, Bloomfield, Anna - Maidstone

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Government advice embodied in NPPG17, which will be superseded by SPP17, makes it clear that the Authority should consider aviation issues in the context of the preparation of Development Plan policies. Please consider inclusion of an appropriately worded policy within the Structure Plan.

Response:

The development plan framework adequately addresses transport issue and potential development. A separate policy on aviation is not required.

Action:

DKA Planning, Per Fieldwork Contracts Ltd, Pollock, Allan - Kirkcaldy

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

It is suggested that the scale and location of future housing sites within the St Andrews Housing Market Area is inappropriate and will lead to significant change and adverse impact in the landscape setting of St Andrews. The proposed key locations are contrary to the findings of previous landscape studies specifically intended to identify those areas considered to be of importance in retaining the existing character and qualities of the setting of St Andrews. For this reason, it is suggested that consideration now be given to a dispersed development strategy as an alternative means of accommodating growth in a fashion that both minimises impact on the landscape, whilst supporting rural communities, facilities and local schools, ensuring future viability and sustainability.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

Housing allocation in St Andrews reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The owners of Northbank Farm intend to promote significant farm diversification and tourism projects. Although not part of proposals, it is suggested that land could be made available for a modest level of residential development at Cameron in support of this dispersed development strategy. The farm diversification project will require infrastructure investment, which would have significant excess capacity to support an additional development of approximately 30-40.

Response:

Noted. This is not a Structure Plan issue and is more properly addressed by the St Andrews & East Fife Local Plan. Comment will be considered in this context. The Structure Plan identifies large and medium scale housing allocations and the general location. The Area Local Plan identifies all new housing sites and therefore is the appropriate Plan in which this development proposal should be considered.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Rural Economy

Comment:

The consultative draft plans do not accurately reflect current Scottish Executive policy on rural development and farm diversification.

Response:

The Plans are consistent with Scottish Executive guidance. Draft Plan Policy E3 is now contained in Core Local Plan policies, which are applicable Fife-wide. The policy will be incorporated into Local Plans and has been deleted from the Finalised Structure Plan to avoid unnecessary duplication.

Action:

Draft Plan Policy E3 is now contained in Area Local Plans.

DKA Planning, Pollock, Allan - Kirkcaldy

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

The retail strategy of the Fife Structure Plan should consider that the proposed Strategic Development Areas will generate additional quantitative convenience retail capacity within the Structure Plan area. The draft structure plan acknowledges support for local convenience shops to serve the local communities, however, this local provision only caters for the daily or casual needs of local residents and does not address their bulky convenience requirements. An effective strategic policy framework is required to address the issue of bulk convenience provision, in light of the proposed residential expansion throughout the plan area. The implementation of an appropriate policy framework for large scale convenience retailing will ensure that large scale developments will be directed to appropriate locations in order to meet future demands for food provision.

Response:

The Policy framework, as amended, will provide guidance for all new retail proposals. The economic effect of the SDAs has been taken into account in the Finalised Structure Plan. Detailed land use allocations will be addressed via Local Plans and Master Plans. In addition, Supplementary Guidance on retailing will be published.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

In view of the growth expected in the non food sector it is anticipated that existing convenience stores will apply for permission to increase the comparison floorspace within stores in order to meet identified future demand. The provision of comparison floorspace within existing foodstores will result in additional convenience trade as well as comparison trade in these stores and subsequently have an effect on existing shopping patterns within the Structure Plan area. Care needs to be taken to ensure that the consequential impacts on both convenience and comparison expenditure is correctly measured to protect existing retailers. The draft Structure Plan should further consider the role and protection of existing local shopping provision in order to meet the Structure Plan's objectives of sustainable growth. In order to achieve the objectives of sustainable growth throughout Fife the Structure Plan should provide a strategic policy context for Fife Local Plans which effectively promotes and protects the viability and vitality of local centres and neighbourhood shops. A balance should be achieved between the development of sub regional and district town centres and the provision of local retail facilities.

Response:

The Policy framework, as amended, provides guidance for all new retail proposals. Detailed land use allocations will be addressed via Local Plans and Master Plans. It is considered that Policies S1-3 of the Finalised Structure Plan whilst promoting appropriate retail growth also contain adequate safeguards to protect existing provision. Also, Supplementary Guidance on retailing will be published to address more detailed issues.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The Co-operative Property Group Division supports the rationale behind the settlement strategy, and the proposed use of residential development as a catalyst for wider regeneration.

Response:

Support noted.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

In view of the Structure Plan strategy which seeks to deliver an increase in population of around 20,000 during the period to 2006, it is considered that this will result in an oversupply of housing. Given this context, if Fife Council wants to attract additional population it will need to offer housing opportunities that are more attractive than other competing local authority areas. It is considered that important factors which are within the Council's control should be considered, that is to say the visual attractiveness of the area, its range of services, its accessibility to the wider residential belt, quality of education provision and other services are all likely to be key issues for house buyers.

Response:

Support noted.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

An over-reliance on residential development as a regeneration tool could significantly weaken the chances of successfully delivering a net inward migration to Fife. If a significant proportion of houses for sale are in areas where there may be problems of social inclusion, a lack of investment in facilities and infrastructure, etc, then it is unlikely that people will want to move to Fife in preference to other locations. Furthermore, as there will be an oversupply of houses on the market for local residents, then these people will also probably chose more attractive locations elsewhere in the area in preference to towns and villages which are perceived to have less attractions. In summary, if the policy to increase the population of the area by 20,000 is to be achieved, then a range of housing opportunities needs to be provided, which are not based principally on the notion of residential-led regeneration. More choice is required in terms of location as well as tenure, house type, etc, than this presently being proposed.

Response:

Planned regeneration via residential development has achieved the desired result in many areas and should improve the image of many areas considered by developers to be unattractive. The Finalised Structure Plan and the Area Local Plans via Master Plans and design briefs will deliver an attractive range of new dwellings.

Action:

GLHearn, Per The Co-operative Group Property Division, Jackson, Ruairidh - Glasgow

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

In general, support the rationale behind the settlement strategy and the proposed use of residential development as a catalyst for wider regeneration. However, if a policy to increase the population of Fife by 20,000 is to be achieved, a range of housing opportunities needs to be provided, which are not based principally on the notion of residential-led regeneration. More choice is required in terms of location, as well as tenure, house type, etc., than is presently proposed.

Response:

Support noted. While the focus of the Plan is on population growth and regeneration, the development strategy provides for a broad range of housing opportunities in locations across Fife. This includes the large and medium-scale allocations identified in the Structure Plan, together with the balance of the housing land requirement that will be identified in Local Plans.

Action:

A number of changes have been made to the strategic housing allocations as detailed in the Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Lochgelly

Comment:

The strategic allocation at Lochgelly may not generate the kind of demand required to satisfy the proposed allocation. Given its location, it also lies outside the sphere of influence of the main housing markets of the area and so may also fail to attract enough new residents. Recommend that Policy SDA1 is amended and Lochgelly removed as it is more suited to medium-scale development, with the remainder of units redirected to larger settlements and their hinterland to reflect where demand is greatest.

Response:

Lochgelly is retained as an SDA, to deliver housing and employment growth which will be linked to the transport network and drive the regeneration of the town. Redirection of development to larger settlements to meet demand would fail to deliver the Plan's strategy, which balances growth in Dunfermline with major regeneration aims.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Dunfermline

Comment:

Recommend that the Structure Plan promote a wider area of search with regard to Dunfermline to meet the Strategic Development allocations, including the peripheral settlements that surround Dunfermline. Propose that Policy SDA1 be amended to require that Dunfermline SDA be defined as the town and its neighbouring villages. There should also be an additional policy requirement to ensure that the subsequent local plan addresses the identification and phasing of sites through an integrated masterplanning approach for Dunfermline and its hinterland.

Response:

Disagree. Dunfermline SDA is focussed on reinstating the city centre at the heart of Dunfermline life and integrating new development. A large-scale, single area development adjacent to the city will achieve development in a planned way, avoiding piecemeal development and optimising opportunities for planning gain.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Recommend that the Council identifies the general location of the Green Belt and its policies with full regard to the requirements of Circular 24/1985, which does not consider has been properly addressed in the draft Plan.

Response:

The principle of Green Belts in Dunfermline and St Andrews was established in the Approved Fife Structure Plan 2002. Detailed delineation of boundaries and policy guidance is more appropriately dealt with via Local Plans which are based on Ordnance Survey Maps. The Scottish Executive has recently issued a Scottish Planning Policy (SPP) note on Green Belts which updates Circular 24/1985. This has been taken into account in finalising the Structure Plan and will inform the St Andrews and East Fife Local Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The Co-operative Group Property Division has a large landholding at Crossford, which it would promote for allocation through the development plan process. Development at this location would support services in the village and increase housing choice.

Response:

Proposal H2 of the Finalised Structure Plan now contains a strategic allocation of 500 units for West Villages in addition to the identification of an SDA in Dunfermline. Site specific matters will be addressed by the Dunfermline and Coast Local Plan.

Action:

Amend Finalised Plan Proposal H2 to take account of West Villages and allocate 500 houses.

DTZ Pieda Consulting, Per CIS Ltd, Fraser, Callum - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

CIS requests that Fife Council upgrades Glenrothes Town Centre to a sub-regional shopping centre in the Finalised Structure Plan shopping hierarchy, as per Dunfermline and Kirkcaldy.

Response:

Request noted, however, it is considered that the upgrading is not justified in terms of the scale of the existing centre and is inconsistent with the overall strategy. Additional wording has however been inserted to highlight the diversity of the District Centres with Glenrothes being the largest. Policies S1 and S2 still direct a measure of new retail development to Glenrothes.

Action:

Add additional text to highlight Glenrothes' role as being the largest of the District Centres.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

The Structure Plan identifies Glenrothes as a 'district town centre', however given the quality and range of shops and facilities of Glenrothes, the town centre is much more akin to Dunfermline or Kirkcaldy town centres than Cupar, St Andrews, Leven or Cowdenbeath. Furthermore of the three largest centres, only Glenrothes town centre has continued to expand over the decades, to an extent that rentals now exceed those of Kirkcaldy. In contrast, little new development has occurred in Dunfermline and Kirkcaldy. The Kingdom Centre in Glenrothes is the only modern, covered town centre with a healthy level of retail market interest. The current proposals by Tesco to develop a superstore at the Kingdom Centre is part of this demand. CIS is aware of other major retailer requirements, which will support further expansion of the Glenrothes town centre. An upgrade to sub-regional shopping centre status will be important to maintain the further investment and growth within Glenrothes and it is requested that Fife Council upgrade Glenrothes town centre to a sub-regional shopping centre in the Finalised Structure Plan shopping centre hierarchy.

Response:

Concern noted. However, Kirkcaldy and Dunfermline are larger centres and the Plan's Strategy is to focus on them although not exclusively so. Glenrothes' position as the largest District Centre is acknowledged.

Action:

Add additional text in supporting paragraphs to highlight Glenrothes' role as being the largest of the District Centres.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

There is some conflict in the logic in Draft Plan Policy S2, which directs major shopping proposals to Glenrothes, Dunfermline, Kirkcaldy in the first instance, yet places Glenrothes on a lower district status. Status accorded to Glenrothes in Draft Plan Policy S2 supports the CIS view that Glenrothes should be identified as a sub-regional town centre.

Response:

Noted. Finalised Plan Policy S2 has been fine tuned to distinguish between Kirkcaldy, Dunfermline and Glenrothes. The Finalised Plan has also been amended to highlight Glenrothes' position as the largest District Centre.

Action:

Insert additional text into Finalised Plan Policy S2 to clarify Glenrothes' position, and add text in supporting paragraphs to highlight Glenrothes' position as the largest District Centre.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

Draft Plan Paragraph 3.22 states that Glenrothes plays a complementary role to Kirkcaldy in providing central geographical focus for regional shopping facilities. It is unclear what this statement means in the context of Draft Plan Policy S2. CIS accepts that Glenrothes and Kirkcaldy town centres share the mid Fife catchment, given their proximity and ready accessibility. Each centre represents a shopping destination in its own right, so CIS ask that the term "complementary role" is removed, as it has no obvious application. The main issue is to allow a clear choice of opportunities to attract major retail development and support of the draft Plan's aim to regenerate Mid Fife.

Response:

Agree. Reference to Glenrothes' complementary role has been deleted in the Finalised Plan. The Finalised Plan now clarifies the retail hierarchy.

Action:

Delete reference to "complementary role". Clarify retail hierarchy in Policy S2.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

The Draft Plan para 3.26 forecasts steady growth in non-food retail development and states that the key objective is to reduce the level of non-food expenditure leakage from Fife by increasing the amount of retail floorspace, particularly in Dunfermline and Kirkcaldy. It promotes Dunfermline and Kirkcaldy ahead of Glenrothes as the main location for new non-food retail floor space during the Plan period. In this instance, the draft Plan again neglects the strategic importance of Glenrothes as a retail centre. In line with draft Policy S2 request that the terms of paragraph 3.26 are amended in order that Glenrothes town centre is granted identical status to Dunfermline and Kirkcaldy as a key location for additional non food retail development in Fife.

Response:

Finalised Plan Policy S2 includes reference to Glenrothes albeit that the focus will still be placed on Kirkcaldy and Dunfermline. The Finalised Structure Plan highlights that Glenrothes is the largest of the District Centres.

Action:

Amend Finalised Plan Policy S2 and supporting text to clarify Glenrothes' position as the largest District Centre.

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

The fact that Glenrothes has been allocated a significant proportion of strategic sites in Schedule 2 of the plan and that the Plan encourages high quality mixed and diverse residential developments as per para.3.32, adds further support for enhancing the status of Glenrothes town centre in the retail hierarchy, especially as additional improvements to the range in quality of retailing in the Kingdom Centre will occur to meet future customer needs.

Response:

Whilst Glenrothes is allocated a significant number of houses through a strategic allocation, the number has been reduced and Glenrothes is no longer promoted as an SDA. The focus of new development in Mid Fife will be on other settlements such as Kirkcaldy.

Action:

Finalised Plan Proposal H2 allocates 900 houses to Glenrothes East.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

CIS welcomes the proposed Town Centre Action Plan as per proposal PS1 and the updated review of retail capacity by Fife Council (Policy S3), provided that these exercises encourage increased retail development opportunities in Mid Fife and Glenrothes town centre.

Response:

Support for Action Plan noted. It is intended that the improvements to the town centres will increase their attractiveness as retail centres. Although references to town centre Action Plans has been deleted from proposal PS1 Fife Council is still committed to their contribution. Finalised Plan Policies S1-S3 are supportive of town centres and specific reference is made to Glenrothes.

Action:

Keppie, Per Albany Commercial Services, MacCallum, Gordon - Glasgow

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is considered that Policy SS1 should be augmented to enable the redevelopment of derelict sites/formal industrial sites in the countryside. Whilst the Structure Plan covers brownfield land within urban areas, it does not consider the possibility of creating new communities in the countryside to restabilise the rural area and provide for housing choice. In view of the number of former mines and other remnants of the industrial past, it is considered that where circumstances allow, an element of housing capacity could be accommodated on these derelict sites.

Response:

See Finalised Plan Policy BL1 which addresses the issue of brownfield land. Brownfield land is not restricted to urban areas. Policy and Resources Committee of Fife Council which met on 9th January 2003 agreed that a major policy would not be to create any new free-standing settlements in Fife. Small scale development opportunities will be considered through local Plans.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is recommended that the Structure Plan addresses the potential of new sustainable communities being created on former mining sites which are currently derelict and in accessible locations. For example Castlehill mine in West Fife could be redeveloped as a new community providing a range of house types, industrial land and the level of local facilities in support of the rural community and using the facilities available at Blairhall which lies close by. In addition, the site lies close to the Gartarry roundabout and Blairhall on a busy cross-Fife distributory route which enjoys public transport links.

Response:

Noted. Policy and Resources Committee of Fife Council which met on 9th January 2003 agreed that a major policy would not be to create any new free-standing settlements in Fife. Small scale development opportunities will be considered through Local Plans.

Action:

No change.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is recommended that Policy SS1 and the accompanying text address this potential to reuse brownfield sites in the countryside and that enabling criteria added to the policy as follows: "and taking account of" - the creation of sustainable new (village scale) communities developed within former derelict sites within the countryside; - the benefit that new village communities would have in terms of stimulating the local economy and restoring dereliction within Fife.

Response:

No change considered necessary. Disagree with suggested amended wording. Brownfield land is not restricted to urban areas.

Action:

Keppie, Per Cala Homes, MacCallum, Gordon - Glasgow

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Consider that there is a potential over-reliance on Mid Fife in delivering the Structure Plan strategy and as a marketable location in terms of attraction and range and choice, Cupar could be allocated a higher level of supply.

Response:

Cupar is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,450 new houses are proposed at Cupar over the next 20 years, with 1,200 being on greenfield land to the north of the town to facilitate a relief road. This allocation of 1,450 new houses is an increase from the consultative draft Plan which identified 600 -1,000 houses over the same period. This change has been made in response to comments received on the consultative draft Structure Plan together with the need to provide a relief road and affordable housing in the town.

Action:

Housing allocation for Cupar has been increased from 600-1,000 to 1,450 in Finalised Structure Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Support the options being considered for Cupar in reinforcing its role as a service centre, but Cala Homes East Ltd consider that Cupar requires higher levels of growth than currently anticipated in order to achieve significant benefits of upgraded infrastructure including the relief for the town centre. A higher level of growth would enable the Council in partnership with the private sector to deliver a number of key aims for Cupar. In order to achieve these aims a strategic context enabling long-term growth at a higher level than currently envisaged would give the confidence for long-term financial planning to a phased development programme. A wider range of developers and sites could contribute to creating the planning gain elements suggested in para 2.8 of the structure plan.

Response:

Cupar is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,450 new houses are proposed at Cupar over the next 20 years, with 1,200 being on greenfield land to the north of the town to facilitate a relief road. This allocation of 1,450 new houses is an increase from the consultative draft Plan which identified 600 -1,000 houses over the same period. This change has been made in response to comments received on the consultative draft Structure Plan together with the need to provide a relief road and affordable housing in the town.

Action:

Housing allocation for Cupar has been increased from 600-1,000 to 1,450 in Finalised Structure Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Support Policy SS1 and it's intention to work in partnership to deliver the settlement strategy subject to a range of criteria will presumably form the key indicators for Local Plans to establish release promotions. It may be more appropriate that design briefs are prepared rather than a whole range of masterplans. These should be prepared in conjunction with the developers to ensure that the viability of sites are maintained once the planning gain and infrastructure costs are borne.

Response:

Support for Policy SS1 noted. It is considered that the masterplanning approach is required to address the forward planning of larger areas thereby providing a framework for infrastructure provision etc.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Re Policy DC1, Cala Homes East Ltd agree that developers should contribute to addressing any shortfalls in community infrastructure brought about by a particular developer proposal. It is noted that the Council have followed the guidance in the Circular on planning agreements and intend matching the level of contribution to the scale of development and produce a fair formula based on the appropriateness on the level of contribution. It is recommended that reference is made to Circular 12/1996 in the policy to reflect the justification for planning gain requirements. Suggests adding to the policy the words "in accordance with guidance set out in Circular 12/1996", and specify, "refer scale and kind, and relate to the development".

Response:

The planning process cannot ignore the statutory framework within which it must operate. There is no need to make specific reference to Circular 12/1996 in Finalised Plan

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Recommend deletion of words "subject to review" in Policy H1 as it implies that post-2011 the allocations are preliminary. A more definitive stance should be taken to avoid planning blight and developer uncertainty, especially in planning gain and infrastructure.

Response:

Noted. Disagree with deletion, as "subject to review" reflects that housing land requirements will require to be updated within the Plan period, with annual monitoring through the Housing Land Audit. The requirements for 2011-2016 will be subject to interim review by 2009, when revised targets will be set to ensure maintenance of a 5-year land supply at all times.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Policy S1 directs new retail and leisure developments to a number of towns, including Cupar. Diversity of use is encouraged and it is noted that Policy S3 identifies additional non-food capacity for Cupar. Recognise the importance of Cupar as a market town and its service role to its hinterland. Its prosperity and success is linked to the provision of town centre relief, comfort of customers and accessibility to community facilities, many of which link along the main arterial routes. The creation of additional households in Cupar not only increases expenditure and use of community facilities, but also the potential to fund the medium/longer term aspirations to enable significant town centre relief by the provision of a bypass to the town.

Response:

Noted. Reference to non-food retailing in Cupar has been deleted from Finalised Plan Policy S3 although proposal PS1 now makes reference to a retail park for the town. Policy S2 has been amended to specifically make mention of Cupar. Retail development in North East Fife will be directed towards Cupar and St Andrews.

Action:

Include reference to Cupar in Policy S2. Policy S3 revised.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

It would be useful if Draft Plan Schedule H3 broke down the shortfall by Housing Market Area. Agree that the range indicated for the East Fife Local Plan area is flexible and appropriate at this stage prior to Local Plans identifying the appropriate locations based on Policy SS1.

Response:

Noted. Schedule H1 of the Finalised Structure Plan now sets out the housing land requirement by Housing Market Area.

Action:

Amend Finalised Plan Schedule H1.

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

As Cupar is the largest town in the housing market area, higher growth figures should be targeted to Cupar in order to reinforce its service centre role, providing the confidence for long-term masterplanning and infrastructure provision and in support of the existing community facilities. In terms of sustainability, it would be logical to have the bulk of allocations within the town as opposed to significant releases within smaller remote villages.

Response:

Noted. Cupar is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,450 new houses are proposed at Cupar over the next 20 years, with 1,200 being on greenfield land to the north of the town to facilitate a relief road. This allocation of 1,450 new houses is an increase from the consultative draft Plan, which identified 600–1,000 houses over the same period. This change has been made in response to the comments received on the consultative draft Structure Plan together with the need to provide a relief road and affordable housing in the town.

Action:

Housing allocation for Cupar increased from 600–1,000 to 1,450 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Support the means of meeting the housing land requirement through Local Plans, however the range indicated in Schedule H3 does not give the clarity and certainty sought by SPP3 and potentially, the areas of Policy H7 in providing a 5 year supply at all times. Recommend that, at least in the case of Cupar, the higher figure of 1,000 units is listed in the table and the capacity confirmed in policy. This relates back to the comment regarding Policy H1 which to be identified and safeguarded for the Plan period in order to meet targets without having to constantly review policy or be in a position of planning applications in the future being refused on grounds of prematurity. In order to achieve the targets, the allocations require to be specific, safeguarded and a minimum to allow flexibility and choice in line with SPP3.

Response:

Noted. Cupar is identified in Finalised Structure Plan as a Strategic Development Area. A further 1,450 new houses are proposed at Cupar over the next 20 years, with 1,200 being on greenfield land to the north of the town to facilitate a relief road. This allocation of 1,450 new houses is an increase from the Consultative Draft Plan, which identified 600–1,000 houses over the same period. This change has been made in response to the comments received on the consultative draft Structure Plan together with the need to provide a relief road and affordable housing in the town.

Action:

Housing allocation to Cupar increased from 600–1,000 to 1,450 in Finalised Plan.

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Agree that the provision of large sites for new housing should be managed in a planned way, as set out in Draft Plan Policy H4, and that social inclusion and the creation of mixed communities in line with SPP3 is secured.

Response:

Noted.

Action:

Finalised Plan Policy H3 replaces Draft Plan Policy H4.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Agree with the aims and objectives of providing affordable housing in line with PAN 74 and best practice. Whilst supporting the principle, there is concern at the high levels sought for Cupar in light of the other developer contribution requirements. A negotiated position on a site by site basis up to a maximum of 25% (which is consistent with the national benchmark set in PAN 74) would give greater flexibility for both Council and developer to negotiate on individual requirements. Indeed, from the Affordable Housing guidance, Cupar has a comparatively high level of requirement but a lower need based on the demand generated. Demand created by households in the settlements should be used for generating need on an area by area basis, and the levels a target.

Response:

Percentage requirements have been revised in light of the new Housing Needs and Affordability Study and PAN74. They are now consistent with advice contained in PAN74.

Action:

Change to Finalised Plan Policy H4 (Draft Plan Policy H5) percentage requirements in the light of PAN 74..

Comment No: 12

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Cupar

Comment:

Strategic scale allocations if proposed for Cupar to deliver the bypass will require long lead-in times. In supporting the bypass, Ferryfield will complement the town centre and not detract from it.

Response:

Cupar is identified in Finalised Structure Plan as a Strategic Development Area. A further 1,450 new houses are proposed at Cupar over the next 20 years, with 1,200 being on greenfield land to the north of the town to facilitate a relief road. This allocation of 1,450 new houses is an increase from the Consultative Draft Plan, which identified 600–1,000 houses over the same period. This change has been made in response to the comments received on the Consultative Draft Structure Plan together with the need to provide a relief road and affordable housing in the town.

Action:

Housing allocation for Cupar increased from 600–1,000 to 1,450 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Transport section of Structure Plan fails to mention the potential for Cupar distributor road as mentioned in the Local Plan. View this as an omission as the implications of such a road are strategic in that it would require significant housing release to enable the private sector to find this provision. The obvious benefits this scheme would bring to the town centre make the provision worthy of safeguarding in Proposal PT2. In addition, this road would contribute to accessibility of St Andrews - a contribution from St Andrews release sites should also be targeted for the provision of this distributor road.

Response:

Cupar is identified in Finalised Structure Plan as a Strategic Development Area. A further 1,450 new houses are proposed at Cupar over the next 20 years, with 1,200 being on greenfield land to the north of the town to facilitate a relief road. This allocation of 1,450 new houses is an increase from the Consultative Draft Plan, which identified 600 - 1,000 houses over the same period. This change has been made in response to the comments received on the consultative draft Structure Plan together with the need to provide a relief road and affordable housing in the town.

Action:

Housing allocation to Cupar increased from 600 – 1,000 to 1,450 in finalised Plan.

Comment No: 14

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The initial Structure Plan allocation 2006-2011 is inadequate and does not accord with SPP3 in terms of timescales. Given the likely timescales for Structure and Local Plan adoption, the Structure Plan should be looking ahead to at least 2013 – 5 years post first local plan completion. In the context of Local Plan adoption and lead-in times, the allocation for Cupar is insufficient; especially when consider that the housing need figure in Cupar alone is 600 units.

Response:

Cupar is identified in Finalised Structure Plan as a Strategic Development Area. A further 1,450 new houses are proposed at Cupar over the next 20 years, with 1,200 being on greenfield land to the north of the town to facilitate a relief road. This allocation of 1,450 new houses is an increase from the Consultative Draft Plan, which identified 600 - 1,000 houses over the same period. This change has been made in response to the comments received on the consultative draft Structure Plan together with the need to provide a relief road and affordable housing in the town.

Action:

Housing allocation to Cupar increased from 600 – 1,000 to 1,450 in finalised Plan.

Keppie, Per Inverkeithing Bay Renewal, MacCallum, Gordon - Glasgow

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Note that the target for Inverkeithing in Draft Plan Schedule H3 is 500-900 units to 2026. A range is perhaps not appropriate as it leads to uncertainty. Clarification is sought that the brownfield supply from such sites as Caldwell Mill will not be stifled in capacity terms by the 900 unit ceiling referred to in Schedule H3. Inveresk Ltd consider that the potential of the Inverkeithing Bay would exceed 900 units and that final capacities in order to deliver this exciting project be determined through the masterplanning exercise.

Response:

Noted. Inverkeithing Bay is identified in the Finalised Structure Plan as a Strategic Land Allocation with potential for 900 houses. The Structure Plan identifies the location and general scale of development, the details which will be progressed through the Dunfermline and West Fife Local Plan and a masterplan. The potential contribution from this location will be monitored and reviewed as necessary.

Action:

Housing allocation to Inverkeithing Bay increased from 500-900 to 900 houses.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Inveresk PLC supports the regeneration of Inverkeithing Bay as a strategic priority and welcome the opportunity to become actively involved in the masterplanning of the Bay.

Response.

Support noted. Inverkeithing Bay has been identified as a Strategic Land Allocation for 900 houses in the Finalised Structure Plan. Also note offer to be actively involved in masterplanning.

Action

Amend Finalised Plan Proposal H2.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Inveresk PLC supports the identification of Inverkeithing Bay as a medium scale expansion area, although the masterplanning process should determine the final scale of housing ultimately capable of being generated within this area.

Response:

Support for Inverkeithing Bay noted. Local Plans and associated Master Plans will consider the detailed issue including detail of house numbers to be developed. Support noted. Inverkeithing Bay has been identified as a Strategic Land Allocation for 900 houses in the finalised Structure Plan

Action:

Amend Finalised Plan Proposal H2.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Inveresk PLC supports the development of Inverkeithing Bay as per paragraph 1.16.

Response:

Support noted.

Action:

James Barr, Per Tullis Russell, Mitchell, Alex - Glasgow

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

The 2002 Retail Capacity Study identified that there was no surplus capacity to support an additional convenience store within Central Fife. This was based on the fact that permission had been granted for a large food store in Glenrothes. However to date this new facility has not been developed. This lack of progress means that the catchment is still suffering from poor provision of services and leakage of locally derived expenditure to other towns such as Kirkcaldy. On this basis there is scope to consider the development of an additional food store within the Glenrothes catchment to meet this demand. Queensway would be an appropriate location for retail development and, in particular, an appropriate location for retail warehousing in line with the recommendations of the Fife Retail Capacity Study 2002. Such development would be consistent with the adopted Local Plans Mixed Use policy designation and would meet the aims of the draft Structure Plan in terms: of increasing employment opportunities; seeking to direct major new employment creating development to the main towns, particularly within Mid Fife; and, assisting in the transition to a more broadly based economy with significant growth in service sector employment.

Response:

The delineation of settlements' town centre areas and the allocation of land for specific purposes is a function for the Kirkcaldy and Mid Fife Local Plan as is the allocation of Queensway area for the suggested uses. The fact that an outline planning consent for a town centre superstore already exists in Glenrothes cannot be ignored and must be taken into account.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Tullis Russell is of the opinion that the land in its ownership to the north of Glenrothes town centre comprises brownfield, vacant land within the urban area and therefore can be considered to be appropriate for housing development under the terms of the draft Structure Plan and in particular Draft Plan Policy H3.

Response:

Comments noted. The pre-draft consultation for the Kirkcaldy and Mid Fife Local Plan is underway, with the Draft Plan programmed for March 2007. Detailed issues of land allocation will be addressed through the Local Plan and an integrated and phased masterplan prepared in consultation with local communities. landowners and stakeholders.

Action:

Draft Plan Policy H3 replaced by Finalised Plan Policy H2.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Objects to the requirements of Draft Plan Policy H5. There is no justification under Policy H5 to seek financial contributions where there is no demonstrated need to provide affordable homes. The problems identified in the Local Housing Strategy are not a planning issue but are a housing management problem and should not be the responsibility of land owners and developers. SPP3 makes it clear that the planning system can contribute to the provision of affordable housing, where there is an identified need. On the basis that there is no identified need for additional affordable homes in Mid Fife, our opinion is that Policy H5 goes beyond the principles established in SPP3 and is therefore ultra vires.

Response:

Finalised Plan Policy H4 (was H5) and the equivalent policy in the Supplementary Guidance (AH1) have been revised as a result of the updated Housing Needs and Affordability Study. This study identifies a need for about 1,000 new affordable houses in the Kirkcaldy housing market area. Finalised Plan Policy H4 and Supplementary Guidance Policy AH1 are considered to be consistent with SPP3.

Action:

Revise percentage requirements.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Brownfield, urban sites by their very nature generally require significant infrastructure and remediation improvements to make the land suitable for residential use. These additional or 'abnormal' development costs should be taken into account when assessing any contribution for affordable housing under Draft Plan Policy H5 or community infrastructure under Policy DC1. This is acknowledged in the Supplementary Guidance on Affordable Housing but requires to be explicit in the related policies.

Response:

Finalised Structure Plan sets strategic Policy approach. Detailed discussions will follow once the process has been advanced via Area Local Plans, Master Plans and development briefs. Finalised Plan Policy DC1 and Proposal DC1 provide details at an early stage in the planning process to both assist the development industry and provide clarity in terms of requirements. Affordable Housing requirements set in Finalised Plan Policy H4 (Draft Plan Policy H5).

Action:

James Barr, Per Palisade Properties, Mitchell, Alex - Glasgow

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

In general welcome the designation of Cowdenbeath as a district centre in the retail hierarchy and is encouraged by the positive nature of the Council's objectives towards improving town centres and the economy of Fife. Nowhere are these objectives more important than in Cowdenbeath, which has suffered from poor investment in the past. These policy objectives set a positive context in which to bring forward redevelopment proposals for company's town centre site at Cowdenbeath.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

Whilst the draft Structure Plan seeks to promote retail development and investment in town centres through Draft Plan Policy S1, Draft Plan Policy S3 introduces a conflict with this policy approach in relation to Cowdenbeath as it states that 'at the time of preparing this Plan retail capacities for Fife towns have been met for food and non-food all town centres/areas except for Cupar for non-food retail. It is assumed that Policy S3 is based on the Retail Capacity Study 2002 which was undertaken on a sub - regional basis, splitting Fife into three catchments of, which Cowdenbeath is located in the West Fife catchment. The Study examined expenditure flows outwith Fife however it did not examine the distribution of expenditure within the catchments themselves. It is considered that there is significant surplus within the Cowdenbeath catchment and therefore capacity for additional convenience floorspace does exist within the town and this has been demonstrated by previous DTZ surveys in connection with the development at Northend Park Cowdenbeath in 2000. This study estimated 50% of convenience expenditure from Cowdenbeath is actually being spent outwith Cowdenbeath, most probably in Dunfermline and it is suggested that a significant proportion of the convenience expenditure derived from Cowdenbeath is actually being spent in out-of-centre locations not in town centres. As a consequence the draft Structure Plan does not actually achieve what it seeks to do in the context of Cowdenbeath. Therefore recommend that such references be removed from the draft Structure Plan and a more flexible approach to retail development in town centres to be promoted.

Response:

The last paragraph of Finalised Plan Policy S3 has been deleted. In addition Finalised Plan Policy S2 provides scope for potential developers to demonstrate the reasons why their proposal is worthy of support by using a Retail Impact Assessment as appropriate.

Action:

Delete last paragraph of Policy S3.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

The Structure Plan should identify a specific opportunity to develop new convenience floor space in Cowdenbeath. Consider that this will bring significant urban renewal and other positive factors to the town centre.

Response:

The Structure Plan only addresses strategic issues and cannot identify site specific proposals. This is a matter for the Dunfermline and West Fife Local Plan. Policy S1 specifically refers to Cowdenbeath Town Centre in terms of general retailing.

Action:

James Barr, Per Landteam Scotland (Glenrothes) Ltd, Mitchell, Alex - Glasgow

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

Propose the development of further business and industrial development on the vacant land adjoining the Canon building at Westwood Park, Glenrothes.

Response:

Noted, but consider Glenrothes has an adequate supply of strategic employment land. Finalised Plan Policy E1 and Proposal PE1 make provision for Fife Airport at Glenrothes.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Propose the development of Westwood Park, Glenrothes for a mix of housing and business and industrial development, in accordance with the Draft Plan and in particular Draft Plan Policy H3.

Response:

Noted. Further work has been undertaken to reassess the Plan's land allocations. The detailed issues of land use allocations will be addressed in the Area Local Plan, Master Plans and development briefs.

Action:

Draft Plan Policy H3 now Finalised Plan Policy H2.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The draft structure plan indicates that the Local Housing Strategy does not establish a need for additional affordable housing in Mid Fife, identifying the problem in that area to relate to the quality and type of stock. Thus we believe that there is no justification under Draft Plan Policy H5 to seek financial contributions where there is no demonstrated need to provide affordable homes. Problems identified in the Local Housing Strategy are not a planning issue but are a housing management problem and should not be the responsibility of land owners and developers. Where there is an identified need, SPP3 makes it clear that the planning system can contribute to the provision of affordable housing. On the basis that there is no identified need for additional affordable homes in Mid Fife, it is our opinion that Policy H5 goes beyond the principles established in SPP3 and is therefore ultra vires.

Response:

The updated Housing Needs and Affordability Study identifies shortages of both general needs and special needs housing in Mid Fife. The Study is considered to be robust. These needs have been reflected in an amended Finalised Plan Policy H4 (was H5) and updated Supplementary Guidance.

Action:

Revise Finalised Plan Policy H4

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Brownfield, urban sites by their very nature generally require significant infrastructure and remediation improvements to make the land suitable for residential use. These additional or 'abnormal' costs should be taken into account prior to assessing any contributions for affordable housing under Draft Plan Policy H5 or community infrastructure under Policy DC1. Secondly, where there is a cross-funding requirement attached to any proposal, this should also be taken into consideration as any additional costs will dilute the original justification for the proposal and render the cross funding element less effective.

Response:

Finalised Structure Plan sets strategic Policy approach. Detailed discussions will follow once the process has been advanced via Area Local Plans, Master Plans and development briefs. Finalised Plan Policy DC1 and Proposal DC1 provide details at an early stage in the planning process to both assist the development industry and provide clarity in terms of requirements. Affordable Housing requirements set in Finalised Plan Policy H4 (Draft Plan Policy H5).

Action:

James Barr, Per Messrs Allister (Halbeath), Mitchell, Alex - Glasgow

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Messrs Allister, in reference to land at Halbeath bounded by the Dunfermline to Cowdenbeath railway line, the A92 and to the West by M90, suggest that this site could be used for a mixed use development including commercial, class 4, hotel, leisure and car showroom uses, which they consider consistent with other developments in the area. The Fife Structure Plan 2006-2026 has identified on its proposals map that there are opportunities within the North East Dunfermline area particularly located around the M90 and A92 routes and the railway line, for further development. Land for employment uses and Strategic Development Areas have been highlighted, which promote the mixed use development opportunities of employment and residential use within this location. therefore the opportunity to create an appropriate development of the proposed uses in this location will assist and provide appropriate land uses in the area which has been subject to similar developments, where there will be minimal effects on the surrounding countryside area and settlements, and where existing facilities and infrastructure in the surrounding location will support any development.

Response:

The detailed allocation of land uses in this area will be identified in the Area Local Plan which will be the subject of public consultation.

Action:

James Barr, Per Messrs Allister (Crossgates), Mitchell, Alex - Glasgow

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Messrs Allister Ltd consider that the site which is located immediately to the West of Crossgates and the South of the slip road on the A92 to the M90 should be brought forward for residential development. It is considered that development of this site for housing would provide an opportunity to promote sensitive future growth and expansion of Crossgates with additional housing which will provide variety and choice in the local areas of Dunfermline/Cowdenbeath. As there are currently infrastructure provision constraints, this site should be viewed for development in the medium to longer-term. It is considered that the Fife Structure Plan 2006-2026 has identified in the key diagram that there are opportunities within north-east Dunfermline for development located around the M90 and A90 routes and the railway for future development. It is also evident from the Structure Plan that there is a major housing provision requirement within Fife, and Dunfermline is an allocated a major development area to assist in coping with future development pressure. Whilst it is realised that the majority of housing will be provided either on major greenfield release sites or brown field sites within settlements, the potential of green field expansions of smaller settlements, such as that at Crossqates for future development should not go unnoticed. In addition recognition of the importance of small development opportunities, such as that at Crossgates, further links to existing settlements, the local amenities and facilities and proximity to local businesses and employment uses should be identified in the Structure Plan.

Response:

Strategic housing allocations are set out in Finalised Plan Proposal H2. No strategic allocation is made to Crossgates.

Action:

No change

The Development Planning Partnership, Per Halladale Developments Ltd, Innes, David - Glasgow

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Consider that Dalgety Bay should be included as a district centre in hierarchy of shopping centres. In view of the constrained nature of the existing town centre area and statement in the adopted Dunfermline Coast Local Plan and that Fife Council seeks to identify opportunities for improving Dalgety Bay town centre. It is therefore considered that, in line with NPPG8, there is need to provide additional land for retailing outwith existing the Dalgety Bay town centre, and that the most suitable option for this is the site at Donibristle Industrial Estate, which is considered to be edge-of-town-centre, located approximately 220 metres from the existing town centre. Further it is considered that there is capacity within the catchment, however the application is driven by the perception that a qualitative improvement is required within the area as Dalgety Bay is poorly served in terms of convenience retailing. SPP2 supports change of use of such land where there is little prospect of it being taken up for business or industrial use and where there will remain adequate local supply of local sites and premises.

Response:

The retail hierarchy in Fife, as elsewhere, has been assessed on the basis of a number of factors including total floorspace, total durable floorspace, number of occupied shops and average retail rents. On this basis, Dalgety Bay has not been included as a District Centre. However, the hierarchy will be reviewed as and when appropriate. Site specific issues are more appropriately addressed through the forthcoming Dunfermline and West Fife Local Plan.

Action:

No Change

ID 0058

Oatridge Ltd, Johnston, Charles - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

Oatridge Ltd propose the development of land at Fordelhill Farm, by Leuchars, for a range of uses as specified in their draft master plan.

Response:

The proposal would result in a new settlement which is not consistent with the strategy of the Finalised Structure Plan.

Action:

A H Smith, Per Messrs Raith Homes, Smith, A H - Greenloaning

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Messrs Raith Homes object to the exclusion of land located on the northwest side of Kirkcaldy as one of the six designated Strategic Development sites proposed to accommodate large scale, comprehensive, developments over the projected plan period. Consider that their site, which extends to 270 (ha) could be broken down in five parcels as follows:

Area A 46 (ha) for retail business and leisure uses;

Area B 42 (ha) which would be sub divided, 3 hectares for commercial uses i.e. local shops; 39 for residential uses;

Area C 34 for residential use

Area D 105 (ha) for residential use

Area E 43 (ha) of which 5 hectares would be set aside for school and playing fields and the balance of 38 (ha) for residential use.

Are aware of drainage constraint problems and have been in consultation with Scottish Water to evaluate site specific issues. Messrs Raith Homes consider the site should be carried forward within the Structure Plan because of the following: the land is within the control of Messrs Raith Homes and its location on the northwest side of Kirkcaldy makes it ideally located to satisfy any demand for development land over, and beyond, the projected plan period. The land is within the control of a willing developer, ensuring an ongoing supply of development land to meet the Structure, and Local Plan requirements. In terms of Policy SS1, development of the site on the northwest side of Kirkcaldy would wholly meet the first eight criteria (the drainage position would be subject to further clarification, as well as the final ten) the final 10 (of 12) criteria, which require to be taken into account in allocating development land. Compliance with Policies SDA1 and DC1 is either already in place or could be met through discussion with Fife Council.

Response:

Objection noted. Finalised Plan Proposal H2 identifies Strategic Land Allocations with no change to Kirkcaldy South West allocation.

Action:

A number of changes have been made to the strategic housing allocations as set out in the Finalised Plan Proposal H2.

Derek Scott Planning, Per Wilson Homes Limited, Scott, Derek - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Wilson Homes Ltd has particular concerns about the proposed housing strategy in the draft Structure Plan, which concentrates and allocates all of the future housing requirements in large Strategic Development Areas and settlements identified for medium scale expansion. Whereas the principles of sustainable living are commendable, it is considered that if houses are provided in a particular settlement or location, that people will automatically work there too. This is unlikely to be the case. As a consequence of concentrating housing development in larger settlements and in the absence of a policy in the Fife Structure Plan which distributes allocations more widely across a range of settlements, the viability of smaller villages and towns will inevitably suffer as a result of ageing populations and a consequent decline in the younger population. This will inevitably lead to declining primary school populations unless investment is made in community facilities. In order to address Wilson Homes Ltd's concerns and in the process reduce the Councils' reliance on large scale sites, which are notoriously difficult to deliver on time increasing housing choice and support existing facilities and services in smaller villages, it is considered that each of the housing/local plan market areas should be given a specific housing allocation for smaller settlements, which lie outside the large Strategic Development Areas and settlements chosen for medium scale allocations. Wilson Homes Ltd has particular interests in St Andrews and East Fife Local Plan area and in this respect they are of the view that at least a further 250 houses should be identified for other settlements outside those identified and referred to in Policy H2.

Response:

Strategic housing allocations are set out in Finalised Plan Proposal H2.

Action:

A number of changes have been made to the strategic housing allocations as detailed in the Finalised Plan at Proposal H2.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

It is considered that Policy H5 is contrary to PAN 74 on Affordable Housing in a number of respects. Firstly, PAN 74 indicates that each site should contribute 25% of the total number of units as affordable units, whilst it goes on to state local authorities may seek a higher percentage on a specific site, this would only be appropriate in exceptional circumstances. Policy H5 as drafted seeks the provision across Fife of 30% affordable housing with higher percentages of 40% and 45% sought in Cupar & Dunfermline respectively and as such is contrary to PAN 74. Secondly, PAN 74 states that for sites in urban areas, the local authority should seek to achieve on-site provision for development of 20 units or more, but on smaller sites allow for off-site provision or commuted sums. As policy H5 requires a provision of affordable housing in association with development of more that 10 units, this is contrary to the advice in the PAN. Thirdly, para 38 of PAN 74 states that land for affordable housing should be transferred to the provider at a value relating to its end use for affordable housing or by agreement between the developer and the provider of the affordable housing. The requirement of Policy H5 to provide this land at nil cost to the Council is also at odds with the terms of PAN 74.

Response:

PAN 74 was published after the Consultative Draft Structure Plan was approved. It has been taken into account in the Finalised Plan and also in the Supplementary Guidance. These documents are now consistent with the PAN in terms of percentage requirement, site thresholds and transfer value of land.

Action

Change Finalised Plan Policy H4 (was Draft Plan Policy H5) in respect of percentage requirements, site thresholds and the transfer value of land.

ID 0061

Gray Construction Ltd, Gray, David - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

Resubmission of the proposal to develop a site at William Street, Dunfermline for residential purposes which was recently refused planning permission. Consider that proposal is consistent with many of the stated policy intentions outlined in the consultative draft Plan.

Response:

Detailed planning proposals are determined on the basis of all the material considerations contained in the Development Plan (Structure Plan and Local Plan) not on the basis of the Structure Plan policy alone.

Action:

Deanway Development Limited, Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

With regard to Policy S2, there is no justification for the proposal that retail developments in excess of 2,500sq metres gross (noting there is no justification to describe this size as major) will in the first instance be encouraged to locate in Dunfermline, Kirkcaldy or Glenrothes. Such a policy could deprive other towns of additional floor space which they require to serve their catchments. Further the implication of directing the development to the identified towns may result in longer travel distances contrary to the principle of sustainable development.

Response:

Wording of Policy S2 has been amended in Finalised Structure Plan to include Cupar. However, it is considered that the wording of Policy S2 does not prevent the location of development in excess of 2,500 square metres being developed in settlements other than the 4 mentioned, provided a retail impact assessment confirms that it would not have any adverse impact and that it was consistent with other policy guidance.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

The final paragraph of Draft Plan Policy S3 states "at the time of preparing the Plan, retail capacities for Fife's towns have been met for food and non food in all town centres/areas except for Cupar for non-food retail". As a footnote acknowledges "a review of retail capacity is ongoing over the Plan period. The policy will be updated in the Finalised Plan. A number of outstanding planning consents exist and sites are identified in Local Plans". In these circumstances it should be deleted.

Response:

Final paragraph of Policy S3 has been deleted in the Finalised Structure Plan. 2006 Retail Capacity Study has identified some capacity for further food provision up to 2016.

Action:

Amend supporting text to acknowledge there is now some capacity for food provision in the period to 2016.

Stewart Milne Homes, McGowan, Marianne - Weshill, Aberdeen

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Welcome Fife Council's ambition to grow population.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Consider more emphasis needs to be put on rural parts of Fife and the North of Fife to encourage regeneration in that area. Not withstanding welcome housing rural areas will concentrate on a number of areas including the Tay Bridgehead as it will take advantage of the good communications afforded by the area.

Response:

This will be achieved via the Area Local Plan. Support for rural housing areas concentrating on areas in the Tay Bridgehead noted.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Concerns about Draft Plan Policy DC1 and do not accept it should be entitled Developer Requirements as it implies contributions will be a prerequisite to gaining permission and will be necessary in all situations. Consider should be headed Developer Contributions.

Response:

Finalised Structure Plan sets strategic Policy approach. Detailed discussions will follow once the process has been advanced via Area Local Plans, Master Plans and development briefs. Finalised Plan Policy DC1 and Proposal DC1 provide details at an early stage in the planning process to both assist the development industry and provide clarity in terms of requirements.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Object to the Draft Plan statement at paragraph 3.4 that "no costs should fall to the public purse particularly when bringing forward major development sites". It is considered that public agencies have statutory duties such as the provision of education which cannot be passed on to developers and the private sector. Any such requirements must be relate in scale and kind to development as per Circular 12/1996.

Response:

The statement in Draft Plan Para 3.4 refers to the cost of provision of infrastructure. However, it should be noted that community infrastructure has two elements, the physical fabric of the facility and the staffing/running costs. The former would be provided by the developer the latter by other agencies including Fife Council.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Consider Policy DC1 is ambiguous in that Fife Council are seeking contributions from developers to address "any" shortfalls in community infrastructure and/or mitigate "any" adverse impact. Consider this needs to be related as per Circular 12/1996. Word "any" and "their surroundings" should be deleted and "adverse impact" requires to be changed.

Response:

The developer is required to ensure that their proposals do not have adverse impacts on its surroundings. Finalised Plan Policy DC1 reworded to delete reference to surroundings.

Action:

Reword Finalised Plan Policy DC1 deleting reference to surroundings.

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

No justification provided for items identified in Draft Plan Policy DC2. Considers this should be related to guidance in Circular 12/1996.

Response:

See contents of Action Plan and Report of Survey (www.fifedirect.org.uk/developmentplan) which provides supporting information. Draft Plan Policy DC2 now Proposal DC1 in Finalised Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Question whether Structure Plan should specify developer contributions in such detail and consider that developer contributions can only be assessed following identification of specific sites in a Local Plan.

Response:

The Finalised Structure Plan sets a strategic policy approach. Detailed discussions will follow once the process has been advanced via Area Local Plans, Master Plans and development briefs.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Welcome preamble to Draft Plan Policy H1 and recognition of need to maintain a 5-year supply of housing land. Consider this should be made explicit in Draft Plan Policy H1 and in a manner consistent with SPP3.

Response:

Noted. Policy H3 of the Finalised Structure Plan addresses the phasing of residential development to ensure minimum 5 year supply of land for new housing at all times. This is consistent with SPP3 and PAN 38.

Action:

Amendment to Finalised Plan Policy H3.

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Considers Fife Matters policy on affordable housing does not meet the terms of SPP3 or PAN 74.

Response:

PAN 74 was published after the consultative draft Structure Plan was approved. It has been taken into account in the Supplementary Guidance on Affordable Housing and in the Finalised Structure Plan. It is considered that the approach taken in the Finalised Structure Plan and Supplementary Guidance on Affordable Housing is now consistent with these documents.

Action:

Change Finalised Plan Policy H4 (was Draft Plan Policy H5) in the light of PAN 74.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Density

Comment:

Considers that Draft Plan Policy H8 is too detailed and that Local Plans should set density requirements.

Response:

Draft Plan Policy H8, now Finalised Plan Policy H6 seeks to secure efficient and sustainable use of land for residential development. Local Plans will provide more detailed guidance on this issue.

Action:

Changes have been made to Finalised Plan Policy H6 in response to the wider comments raising concern in respect of the consultative draft policy.

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Density

Comment:

Considers that densities should be set on a site by site basis and should be dependant on the overall design of development.

Response:

Draft Plan Policy H8 now Finalised Plan Policy H6 allows for a broad density range to provide for a range of house types and layouts. Local Plans and development briefs will contain more detail in respect of densities for individual sites.

Action:

PPCA Ltd, Per Graham Barnet, Allan, Peter - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The bulk of strategic requirements in Schedule H2 are in Central Fife in the Glenrothes/Kirkcaldy area. While not suggesting that this basic strategy is incorrect, it could lead to coalescence, and there are other areas of Central Fife in need of investment. Also, large developments have long lead-in times. Propose that consideration be given to developing a new community centred on the area of Strathruddie Farm, which lies between Lochgelly and Kinglassie for example, as it would provide another community along with a string of communities that already exist. New development would be required to be of a scale which would enable an infrastructure to be provided including new and improved schools, it would be of the order of 1,000 homes, together with further opportunities for business development.

Response:

The Policy and Resources Committee of Fife Council. which met on 9th January 2003, agreed that a major policy would not be to create any new free-standing settlements in Fife. Strategic housing allocations have been reviewed in finalising the Structure Plan.

Action:

A number of changes have been made to the strategic housing allocations as detailed in the Finalised Plan at Proposal H2.

Warren Consultants Ltd, Per UK Coal Ltd, Cameron, Steven - Milngavie, Glasgow

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Markinch

Comment:

UK Coal is, in principle, supportive of the inclusion of Markinch as a Medium Scale Housing Allocation site. However, the medium scale housing allocation for Markinch in Draft Plan Schedule H3 and Policy H2 should be amended to provide for a range of units from 200-1000.

Response:

Support for Markinch MSHA noted. The Finalised Structure Plan allocates 400 units at Markinch over the next 20 years. The emerging Kirkcaldy and Mid Fife Local Plan will identify the specific sites to meet the first 10 years of this need.

Action:

Clarify allocation of 400 units.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Clarification needed as to whether Developer Requirements under Policy DC1 will be expected from all developments or just Strategic Development Areas.

Response:

Finalised Plan Policy DC1 clearly states that it applies to all new development. See also Para 3.7 of Finalised Plan.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Markinch

Comment:

UK Coal considers that due to the extent of their land holding east of Markinch, they can deliver the expected housing mix for the area with other commensurate development including tourism.

Response:

The emerging Kirkcaldy and Mid Fife Local Plan will identify specific sites to meet the first 10 years of this need.

Action:

Clarify allocation of 400 units.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

UK Coal has no objection to the philosophy of developer contributions but also acknowledges there is an expectation in Mid Fife that new residential development will be required to contribute a 25% affordable housing provision. There must however be a level playing field, and any developer requirements policy should reflect the need to ensure that whilst there may be an expectation of developer requirements commensurate with the scale of development, the converse should also be applied: that is, that the scale of development should reflect the expectations of the developer requirements and community gain/benefit.

Response:

Support for philosophy of developer contributions with comments re affordable housing are noted. The Finalised Plan sets strategic Policy approach. Detailed discussions will follow once the process has been advanced via Area Local Plans, Master Plans and development briefs.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Markinch

Comment:

UK Coal notes the Structure Plan policies that would support further additional non residential development at Markinch including Draft Plan Policy E1, Policy E2, Policy E4 and Policy S1. UK Coal is of a view that the location of Markinch, its position on the east coast main rail line, and the proposed integrated transport interchange for the town, offers considerable potential for sustainable mixed development. Moreover a significant factor in favour of developing UK Coal's land is the extent of land and ownership, which negates the potential problems associated with land assembly and site delivery, which is often associated with large development projects that seek to deliver a wide range of facilities and land uses.

Response:

UK Coal's interests in the Markinch area noted. Draft Plan Policies E2 and E4 have been moved to Area Local Plans. The Kirkcaldy and Mid Fife Local Plan will identify specific sites to meet the first 10 years of this need.

Action:

Move Draft Plan Policies E2 and E4 to Area Local Plans. Clarify allocation of 400 units.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Markinch

Comment:

In the terms of the Scottish Executive's general planning the policy and its commitment to the principle of sustainable development, Markinch is well positioned to meet certain policy expectations. It is inherent in the planning system that planning decisions must favour the most sustainable option, promoting development that safeguards and enhances the long term needs of the economy, society and the environment. It is therefore considered that Markinch is ideally situated to accommodate sustainable mixed use development, which is consistent with the aims of the Scottish Executive, further UK Coal's land could form an extension to the existing settlement and would maximise the potential of the new public transport hub at Markinch station whilst tying into the existing and proposed cycle and footpath networks.

Response:

Support for Markinch noted. The Kirkcaldy and Mid Fife Local Plan will identify specific sites to meet the first 10 years of this need.

Action:

Clarify allocation of 400 units.

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

An additional bullet point should be added to Draft Plan Policy H7 to state that "proposals which would result in the HLR being exceeded may be acceptable, where: and/or community benefit/gain necessitate a greater cross-subsidy from residential development".

Response:

Disagree. Land will be identified primarily in Local Plans to meet the housing land requirement as set out in Policy H1. Draft Plan Policy H7 now Finalised Plan Policy H5.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

A greater housing allocation at Markinch, as part of a mixed use scheme, would also be supported by Policy T1, Transport and Development.

Response:

Noted. Markinch is identified in the Finalised Structure Plan as a Strategic Land Allocation. A further 400 new houses are proposed over the next 20 years. This allocation is an increase from the consultative draft Structure Plan which identified 200-400 houses over the same period. The Kirkcaldy and Mid Fife Local Plan will identify specific sites to meet this allocation. The potential contribution from Markinch will be monitored and reviewed as necessary.

Action:

Housing allocation to Markinch increased from 200-400 to 400 in the Finalised Structure Plan.

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Minerals

Comment:

UK Coal notes one of the policy objectives (para 4.11) is to ensure the "safeguarding of mineral deposits from sterilisation." It is suggested that the safeguarding presumption includes a caveat to ensure that only economically viable and workable mineral deposits are safeguarded.

Response:

Economic viability and workability of minerals changes due to many circumstances. Safeguarding all deposits takes account of potential changes in views on viability and workability over time.

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Minerals

Comment:

Paragraph 4.11 should be revised to make the safeguarding of mineral deposits from sterilisation apply only to economically viable and workable mineral deposits.

Response:

The economic viability of mineral deposits varies with time and as it is possible currently uneconomic and unworkable deposits could become economic and workable in the future; it is prudent to protect all mineral deposits.

Action:

Pritchett Planning Consultancy Ltd, Per Tesco Stores Ltd, Pritchett, Phil - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

The plan provides a positive basis for new investment in Fife's towns. However, para 3.24 states that at present there is little quantitative capacity for further foodstores and appears to be the case up until 2016. This statement disregards the fact that there have been substantial investments in a new foodstores in large towns and cities which draw trade from Fife's towns and this investment is likely to continue through the Plan period.

Response:

Food sales leakage to areas outwith Fife is less prevalent than non food sales leakage. The 2006 Retail Capacity Study has identified some capacity for further food provision up to 2016. This is particularly true for areas proposed for significant residential growth. Text amended to reflect this.

Action

Amend supporting text to acknowledge there is now capacity for food provision in the period to 2016.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

The basis on which the retail policies on the Plan have been drafted needs to be made clear in the Finalised Plan. If the population in Fife is to grow, there should be also support for growth of town centres and retail development generally in the area. Otherwise the increased population will not have access to the range or quality of services that they need and leakage of expenditure will continue. Reference to assessments of capacity for retail development is unnecessary as this disregards the nature of retailing in each settlement and ever changing dynamics of the retail market in all sectors. There is a continuing need for improved retail development throughout the Council area as existing retail facilities require updating and modernising to take account of changing customer needs and desires. Some of these facilities are within town centres and others are in district centres and in stand-alone locations. It is important for the Structure Plan to recognise that existing facilities need to continue to serve the community well, and in the case of stores which are well related to existing town centres, the Structure Plan should acknowledge that such stores can form part of expanded town centres. The Plan should therefore include policy support for expanding town centres, where land and buildings are available and deliverable for new town centre type uses including retail.

Response:

The Structure Plan retailing section does take into account the planned increase in population arising from the strategy. It is considered that Policies S1-S2 do provide positively for retailing, especially in relation to town centres. The last paragraph of Policy S3 relating to retailing capacities has been deleted.

Action:

Delete last paragraph of Policy S3.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

As a major centre for services retailing, the reference to Cupar in para 2.8 should be adjusted to provide positive policy support for improving and extending the retail function of the town centre for expanding its current boundaries.

Response:

Agree. Reference to Cupar is now included in Policy S2 and a new bulky goods retail park for the town is promoted in Proposal PS1.

Action:

Include reference to Cupar in Policy S2 and to a new retail park for the town in Proposal PS1.

Ironside Farrar Ltd, Per I & H Brown Limited, - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

I&H Brown strongly supports the settlement development strategy as the key policy mechanism to deliver the Structure Plan's growth requirement for the next 20-year period. In addition, recommend that the first sentence of Policy SS1 be reworded to read "development shall take place within and adjacent to settlements" to reflect the need to expand existing settlement boundaries to accommodate the level of development allocated in the Structure Plan.

Response:

Support noted. The issue of site capacity will be addressed via the Area Local Plans and future capacity situation can be considered in the time of preparing the Local Plan.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Definition of affordable housing needs to be sufficiently broad to reflect percentage of average value and wide social needs. 25% requirement is much nearer the anticipated requirement rather than the 40% indicated in the plan for areas in East area.

Response:

The definition of affordable housing that is used in the Finalised Structure Plan and Supplementary Guidance is consistent with that contained in SPP3 and PAN74. Percentage requirements have been adjusted to reflect the new Housing Needs and Affordability Study and PAN 74.

Action:

No Change to definition. Revise percentage requirements.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

I&HB acknowledges the requirement for developer funded infrastructure, but would emphasise that developers will require support through the incentives in the form of flexible release of development land and opportunities to generate revenue to reinvest in major elements of infrastructure. This will require the prioritisation of sites with major plus benefits, to finance the upfront costs of the subsequent phases of development.

Response:

Accept the principle of approach suggested. The detailed issues relating to the release of sites for development will be addressed via Area Local Plan, Master Plans and development briefs.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

I&HB support the requirement in Policy SS1 to avoid coalescence of adjacent defined settlements around Dunfermline, and the need to protect mineral resources from sterilisation, particularly in north Dunfermline.

Response:

Support noted.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

In view of the scale of development proposed for Dunfermline, I&HB welcomes the opportunity for multi- partnership working, but would emphasise the need for Fife Council to establish a meaningful framework to facilitate collaborative working between the public, private and community sectors.

Response:

Support noted.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Infrastructure

Comment:

It is appreciated that infrastructure is a pre-requisite to development covering issues such as health, education, leisure, transportation etc. and this should be provided prior to or at least concurrent with development. In addition recognition should be made of feeder public service transport routes.

Response:

It is the intention to ensure that the appropriate level of infrastructure and other services required will be provided at the appropriate time.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

I&HB strongly supports the Strategic Development Areas approach identifying key locations, including Dunfermline, for larger residential expansions capable of delivering both effective land supply and infrastructure along with diverse and balanced community structures and supporting services. It should be noted that the Dunfermline SDA offers substantial reserve for future capacity over the currently proposed housing allocations.

Response:

Support noted.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

I&HB fully supports the identification of the Strategic Development Area for Dunfermline offering the capacity to allow concentric urban growth and promote a high quality sustainable approach to new community development. Fully supports the master plan/development framework led approach for the area as a mechanism to deliver strategic goals and also deliver the stakeholders objectives in a more co-ordinated and sustainable manner.

Response:

Support noted.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

As a major land holder and development partner in north Dunfermline, I&HB considers that the Dunfermline SDA offers a substantial capacity to contribute to place building in terms of its contribution to its growth and enhancement of Dunfermline and would welcome early dialogue on actively participating in this long term development initiative. I&HB recognise the need for partnership arrangements with a number of other parties to deliver infrastructure provision roads, water, drainage and community facilities and will accept a key partnership role with Fife Council to facilitate the development process and has accordingly established understandings with other key landowners and developers willing to collaborate to secure common infrastructure. I&HB recommends that Fife Council should consider a Dunfermline SDA partnership to support inputs and submissions appropriate to the preparation of the new Local Plan for Dunfermline to ensure delivery.

Response:

Support and welcome for partnership working noted.

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

I&HB endorse the principle of developer contributions to the cost of the provision of essential community infrastructure, with the caveat that Fife Council will have to establish clear guidance and protocols for the form, scale, time frame, management and thresholds of these contributions and that contributions are realistically deliverable within the prevailing market conditions.

Response:

Accept the principle of approach suggested. The Finalised Plan sets strategic Policy approach. Detailed discussions will follow once the process has been advanced via Area Local Plans, Master Plans and development briefs. These detailed issues would be resolved at a later date in the context of Area Local Plans.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

I&HB endorses the need for an early indication in both policy and action plan of developer contributions, including details of form, scale, time frame and management of these contributions.

Response:

Support noted.

Action:

No Change

Comment No: 12

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Fife Council, in anticipating significant contributions to essential infrastructure must always be mindful of the need to secure investment in qualitative 'design related' planning gain and housing, sustainability, quality of place and innovation. New community models and approaches include market risks and investment cost that needs to be considered alongside physical and community infrastructure.

Response:

Accept the principle of approach suggested. The Finalised Plan sets out the strategic policy approach. Detailed discussions will follow once the process has been advanced via Area Local Plans, Master Plans and development briefs. Detailed issues such as those mentioned will be resolved at a later date.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

There is a clear need for a strategic approach to sequential delivery of community infrastructure to meet both developers' funding programmes and the phased delivery of housing and community development. This requires early and detailed consultation. I&HB emphasise that developers will require support from Fife Council in delivering major utility, transport and ICT infrastructure. Specifically, advanced information on potential transport and Light Rapid Transport system ambitions and procurement will need clarification. This support may require the Council's application of compulsory purchase powers and establishment of transport partnerships.

${\it Response}$:

Accept the principle of approach suggested. The Finalised Plan sets strategic policy approach. Detailed discussions will follow once the process has been advanced via Area Local Plans, Master Plans and development briefs. These detailed issues would be resolved at a later date in the context of Area Local Plans. Details of the transport proposals will be developed via Local Plans out in conjunction with Area Local Plan and Master Plans. The role which the Council could take in assisting the delivery of the strategy will be discussed with partners as each masterplan is progressed.

Action:

No Change

Comment No: 14

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

I&HB fully appreciates that implementation of the Dunfermline SDA will require the comprehensive review of community infrastructure within Policy DC2, and that these facilities will require to be incorporated into a merging development proposals and the supporting business plans. However, the provision of developer contributions will be varied in form and in content in terms of finance, land, infrastructure etc, and may not take, for example, the form of the provision of a fully constructed and equipped secondary school ready for hand over to Fife Council as education authority.

Response:

The details will be discussed with partners in preparing the masterplan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

I&HB also highlight the need for Fife Council to promote strategic thinking within Scottish Water to the provision of water supply and foul and surface water drainage for the Dunfermline SDA.

Response:

Fife Council has consulted with Scottish Water throughout the Plan preparation process and has and will continue to press to ensure that services provided by Scottish Water are in place at the appropriate time.

Action:

No Change

Comment No: 16

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

I&HB also highlight the need for flexibility in the provision of affordable housing in the Dunfermline SDA, to reflect the ground preparation and infrastructure costs likely to be incurred in the early stages of the development programme. Affordable housing allocations need to be addressed on a site/neighbourhood by neighbourhood basis and flexibility of delivery and diversity of approaches is essential.

Response:

The requirement for affordable housing in the Dunfermline area is set out in the Finalised Structure Plan, Policy H4 (Draft Plan Policy H5). The details of the delivery of affordable housing will be discussed on a site by site basis to ensure that targets are met.

Action:

No Change

Comment No: 17

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

In the case of the Dunfermline SDA there is also scope to consider the potential for district heating based on the existing landfill site in North Dunfermline.

Response:

The District Heating Project for Dunfermline is being progressed and potential for use in Dunfermline SDA will be discussed with Fife Council as a development priority and explained via the Area Local Plan, Master Plans and development briefs.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

I&HB support the identification of the requirement for new strategic employment land in the Dunfermline SDA. Consider that there is scope for the provision of employment land to be located in 'urban village' style neighbourhoods within North Dunfermline. Balanced communities, access to employment, services and diverse neighbourhood structures can be secured where major housing land allocation offers capacity to create urban villages integrated with existing communities and settlements. I&HB strongly support the concept of a concentric city growing out from and sustaining a revitalised town centre.

Response:

Support noted. Details on the growth of Dunfermline will be considered through the Dunfermline and West Fife Local Plan.

Action:

No Change

Comment No: 19

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

The provision of new employment and housing land, and the associated infrastructural and community requirements will help secure a balanced, mixed-use development. This approach is fully compliant with the Council's aim of Dunfermline becoming a concentric city. I&HB consider that this employment land allocation to North Dunfermline is more appropriate to a smaller commercial quarter, campus and service sector development, rather than large-scale industrial or business park development. This will provide for a diversity of scales/choice and sectors.

Response:

The detailed allocation of land for various uses will be undertaken as part of the process of preparing the draft Dunfermline and West Fife Local Plan. Whilst the Council is committed to future development in Dunfermline, the term "concentric" has been deleted from the Finalised Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

A degree of flexibility is requested in relation to the size of the designation at North Dunfermline and the various sizes of the land allocations identified within the other SDAs. Such flexibility would ensure that issues such as market demand could be taken into account by policy.

Response:

The issue of size and individual land allocation within SDAs is largely a matter for Local Plans and Masterplans. The employment land allocation will be kept under review.

Action:

No Change

Comment No: 21

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

I&HB supports the focus on urban development of Dunfermline town centre as the sub-regional centre (Policy S1). Strengthening the role and vitality of the town centre is a key part of regeneration and place building. Dunfermline's town centre needs to be the focus for economic functions alongside retail and leisure and transport. North Dunfermline has a capacity to contribute and integrate with the town centre vision. In promoting the growth of North Dunfermline, I&HB endorses the limitation of new retail provision in the development area, with the aim of sustaining the existing town centre and existing edge-of-centre retail parks. Within the new development areas, the Council should seek to establish a retail hierarchy of district, village and neighbourhood nodes, to provide for convenience the needs of local residents and add to the diversity and vitality, and to provide quality local services. It is requested that reference is made to District Centres that are proposed as part of the SDA. These will represent suitable locations for retail, leisure and mixed use development to meet local needs.

Response:

Support for Policy S1 noted. The detailed issues of land allocation will be addressed as part of the exercise of preparing the Dunfermline and West Fife Local Plan, and of any masterplan. Large scale housing development will be supported by other appropriate and integrated land uses including retailing. Reference is made in the Finalised Structure Plan to a network of centres.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

I&HB support the inclusion of assessment criteria, including NPPG8's sequential approach and the consideration of new retail development or redevelopment.

Response:

Support noted.

Action:

No Change

Comment No: 23

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

I&HB welcomes Proposal PS1 to further consult stakeholders and prepare a masterplan to secure the expansion of Dunfermline town centre. This master plan should help to promote an 'identification with Centre' and a real sense of 'Place Building' in anticipation of city status. I&HB also highlight the synergy between north Dunfermline expansion and the comprehensive regeneration of Dunfermline town centre, in terms of the potential increased walk-in catchment that the town centre could benefit from, resulting in enhanced accessibility and quality of connectivity.

Response:

Support for Proposal PS1 noted but provisions have now been subsumed into Policy S3. Fife Council is aware of the proximity of parts of North Dunfermline to the town centre and full account will be taken of this in delineating areas for development as part of the Area Local Plan. The strategy of the Finalised Structure Plan sets out the Council's commitment to regenerate Dunfermline City Centre.

Action:

No Change

Comment No: 24

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

I&HB request that Policy S3 acknowledges the importance of new district centres coming forward within SDAs.

Response:

This is an issue to be addressed via the Area Local Plans, Master Plans and development briefs.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

I&HB supports the housing land allocations for Dunfermline and West Fife for the later periods: 2011-2016, 2001-2021, 2021-2026. However, in view of current difficulties associated with the provision of a minimum 5-year effective supply of new housing land at all times of each Local Plan area, and the identification of the concentric growth model for Dunfermline, it is suggested there is scope for the provision of new housing land in Dunfermline and West Fife for the early period 2006-2011.

Response:

Noted.

Action:

No Change

Comment No: 26

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

I&HB supports the large-scale land allocations for Dunfermline SDA for the later periods and the allocation of sites within the local plan delivered in accordance with the Structure Plan policy framework. However, in view of the identification of the concentric growth model for Dunfermline, suggest there is also scope for the provision of new housing land in the Dunfermline strategic development area for the early period 2006 - 2011. Provision should also be made for greater flexibility in the SDA land allocations to ensure total numbers are deliverable, should certain locations fail to deliver.

Response:

Support noted. The Plan Strategy focuses on the regeneration of Mid Fife, with modest growth in West and East Fife. The Finalised Structure Plan retains the phasing proposed for the Dunfermline SDA, which shows development commencing in the period 2011-16. The annual Housing Land Audit will monitor the 5 year land supply and identify the need for review as necessary.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Whilst acknowledging that the preparation of Local Plans is the appropriate mechanism for the identification of specific housing sites for the large scale allocations in Schedule H2, wish to draw attention to the fact that I&HB land holdings have historically been influenced by previous land uses/below ground mining activity and as such are brownfield sites within the definition of SPP3. Securing development on brownfield and otherwise constrained or despoiled sites should be a priority in Local Plan allocations. In the case of the Dunfermline SDA, this should reflect the presence of brownfield land in north Dunfermline and the potential for new development to contribute to the regeneration of the villages of Townhill, Wellwood, and Parkneuk.

Response:

Noted. The detailed issue of land use allocation will be addressed via the Area Local Plan, Master Plans and development briefs.

Action:

No Change

Comment No: 28

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

There is requirement for flexibility within the six SDA allocations to ensure that the total number of new houses are deliverable, should certain locations fail to secure developer interest or encounter development difficulties e.g. infrastructure provision. For example, Policy H1 states a shortfall of 5,380 units, including 4,550 in the Dunfermline SDA. This implies the allocation of 830 units elsewhere, which will require flexibility if sites prove be undeliverable.

Response:

Noted. Proposal H2 of the Finalised Structure Plan gives an indication of the locations and approximate scale of Strategic Development Areas and Other Strategic Land Allocations. Local Plans will give detailed consideration to the scale and siting of such development, subject to monitoring and review as necessary. The potential contribution from these locations will be monitored through the annual Housing Land Audit and reviewed as necessary.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

A need for 'developer certainty' as explicitly stated within PAN74 reflects the importance of the role played by developers in working with Fife Council and Registered Social Landlords bringing forward and delivering viable affordable housing. As allocations become more transparent with the eventual emergence of the West Fife Local Plan, so the ability of developers to embrace the tenets of SPP3 to produce the range of housing types and choice of environments from affordable homes to executive housing will become more apparent.

Response:

Noted. Close co-operation between relevant parties will be actively encouraged.

Action:

No Change

Comment No: 30

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

In relation to the allocation of 2,160 units to Kirkcaldy and Mid Fife in the period 2006-2011, I&HB can assist Fife Council through the Mid Fife Local Plan process, in the identification and delivery of high quality, effective housing land in Kelty with a capacity between 800 and 1500 units.

Response:

Noted. Finalised Plan Proposal H2 sets out strategic allocations. This will be addressed via the Kirkcaldy & Mid Fife Local Plan.

Action:

No Change

Comment No: 31

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Support the implication within Draft Plan Policy H4 that phasing of housing land releases needs to establish a clarity and forward programme that can be integrated with development planning and infrastructure investment programmes to ensure effective housing land supply and facilitate advance works. The need for significant contributions in terms of 'planning gain' will require committed advance programming and allocations to provide developer certainty.

Response:

Support noted. Finalised Plan Proposal DC1 sets out developer requirements for the Strategic Development Areas, with further detail in the Action Plan and relevant Area Local Plans.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

I&HB considers that in the provision of affordable housing there is a clear need for flexibility to ensure the appropriate location, level of provision and deliverability. Considers that delivering affordable housing requirements will require partnering, and be based on flexible, site by site allocations. I&HB further consider substantial forward dialogue should be encouraged between Fife Council, Communities Scotland and the private sector to identify best practice models and alternative and innovative mechanisms to deliver affordable quality housing and balanced communities.

Response:

It is important for the Fife Structure Plan and associated Supplementary Guidance on affordable housing to set a clear and consistent framework for the delivery of Affordable Housing. It is considered that site by site allocations would be consistent with this at a strategic level. This is more appropriate to the Local Plan process. However, agree that some flexibility is important to reflect localised exceptional circumstances. Agree also that substantial forward dialogue between relevant parties is essential and this will be encouraged.

Action:

No Change

Comment No: 33

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Pan 74's adoption of a 25% affordable housing threshold has resulted in partnerships between developers, Registered Social Landlords, and Local Authorities delivering projects with percentage ranges between 16 and 50%. I&HB consider that Fife Council's aim of 30% for Dunfermline is over ambitious and should be reduced, with targets being set on a case by case basis in agreement between the parties following thorough research and analysis of the dynamics of the market and development costs in the specific area. Less dictum and more negotiation coupled with Section 75 agreements, where appropriate will, in I&HB's opinion, deliver more appropriate local solutions. I&HB recognises the scope for affordable housing provision in north Dunfermline, due to proximity to Dunfermline town centre, transportation corridors and scope for higher density development within key nodes and village centres.

Response:

The principle of partnership working is fully endorsed. The percentage requirement for the Dunfermline housing market area has been revised as a consequence of public consultation, the updated Housing Needs and Affordability Study and the publication of PAN 74. It is considered that an approach based on housing market areas is consistent with SPP3. Use of model Section 75 agreements will be promoted to avoid delays.

Action

Change percentage requirements in Finalised Plan Policy H4 (was Draft Plan Policy H5).

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

I&HB fully endorses the criteria for the assessment of transport and development proposals and the critical importance of connectivity and integrated transport in the development of new neighbourhoods and communities. There is also a requirement to establish a linkage between Policy T1 and the recently published West Area Transport Plan 2005-2010.

Response:

Support noted. The linkages between the Structure Plan and Area Transport Plan are outlined in the Report of Survey.

Action:

No Change

Comment No: 35

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

In relation to the Dunfermline SDA, IHB highlights that North Dunfermline complies with the assessment criteria as follows:

- North Dunfermline's accessibility to expanded public transport network
- Dunfermline's' connectivity to existing walking and cycling routes
- Scope to connect North Dunfermline into the existing road network

The Light Rail Transport (LRT) proposal identified in the draft Structure Plan is connected with a second crossing of the Forth. This LRT is visionary for implementation in the next 20 years. IHB recognises that in the land allocations and urban design proposals for the Dunfermline SDA, including North Dunfermline, there will be a requirement to ensure that new transportation infrastructure has the flexibility to include bus corridors, dedicated bus routing and LRT. There also needs to be a cross-reference to the Queensferry Corridor Study.

Response:

Noted. Reference to the Corridor Study is made in the Report of Survey.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

IHB acknowledges the requirement for transport improvements in relation to the development of the Dunfermline SDA to ensure regional connectivity, in relation to the existing and expanding road networks to serve the concentric growth of Dunfermline and to the strategic road and rail networks. Linkages to the strategic networks should include reference to the multi-modal interchange at Inverkeithing. IHB would stress that key elements in the provision of infrastructure are safe and attractive walking/cycle routes connecting communities, places of employment and community facilities. Delivering a 'Green Travel Plan' for the Dunfermline SDA that positively supports non-car transport choices and facilities healthier and more sustainable lifestyle choices is central to place building and planning for new communities. Developing transport networks and integration of development within an Area or Neighbourhood Travel Plan offers substantial opportunity to secure innovative design and development solutions to encourage balanced travel choices.

Response:

Comments noted. Finalised Plan Proposal PT1 lists the locations for park and ride and /or choose facilities/interchange, to include Inverkeithing.

Action:

Amend Proposal PT1.

Comment No: 37

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

IHB endorses the safeguarding of the disused railway network (Draft Plan Policy T4) particularly in North Dunfermline, where former mineral railway lines have the potential to access the north east sector of the SDA, and to form a new pedestrian/cycling/wildlife corridor from west to east across the site.

Response:

Support noted.

Action:

Draft Plan Policy T4 now Finalised Plan Policy T2.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Opencast Coal

Comment:

I&HB strongly supports a policy (Policy M4) that avoids the sterilisation of mineral reserves and positively seeks to ensure that natural resources and mineral assets can contribute to sustainable development. Highlight that North Dunfermline offers a significant opportunity through ground consolidation to safeguard mineral assets to contribute advance infrastructure and value that offers further additional opportunity to achieve a number of aims. Recommends that the Council adopts a positive policy for the advanced coal recovery and ground consolidation which will offer an advanced landscape and environmental framework. Fife Council has identified the North Dunfermline area as within the 'Area of Search' and technical studies and intrusive site investigation and geotechnical data demonstrate the capacity to work the area as an integral part of advance works/site preparation works package. Environmental scoping and landscape character assessment demonstrate the capacity to secure long term benefits at that dovetail with housing land programmes.

Response:

Support for Policy M4 noted. Comments re North Dunfermline noted.

Action:

No Change

Comment No: 39

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

I&HB endorses the proposal for the Local Plan to identify a Green Belt for Dunfermline, (Policy ENV1) particularly with the aim of protecting the landscape setting of the town, and supporting the development of Dunfermline as a concentric City. However, the Green Belt should be identified in the Structure Plan and shown on the key diagram, with the definition of the final boundaries reserved for the Local Plan.

Response:

Support for Dunfermline Green Belt noted. Not all policies require to be depicted on Key Diagram.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

I&HB considers that there is a need to clarify the relationship between South Fife Economic Development Zone, the Dunfermline SDA and the Green Belt proposal. Consider that the main scope for the designation of Green Belt is to the South and West of Dunfermline. There is limited need or rationale for Green Belt designation in North Dunfermline due to existing landscape quality and lack of visual connection with Dunfermline's historic core. The early confirmation of the Green Belt boundaries is important to allow for the establishment of the extent and composition of the Dunfermline SDA and to inform the local plan process.

Response:

The detailed boundaries cannot be shown on the Key Diagram. The Local Plan will delineate the boundaries in detail taking account of the reason for designation including inter-visibility of historic core.

Action:

No Change

Comment No: 41

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

The Green Belt designation should be used to support the development of Dunfermline as a concentric City. In addition, the Green Belt and Green Wedges will make significant contributions to the quality of place, connectivity to countryside around the town and the establishment of meaningful 'green reserves' as sanctuary for biodiversity and wildlife.

Response:

Detailed delineation of Dunfermline Green Belt will take account of various functions it must perform including contributing to biodiversity and nature conservation.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

North Dunfermline provides a major opportunity for large-scale landscape renewal, to contribute to the improvement of the landscape setting of the town. Building a new landscape character that is distinctive, multi functional and creates a hierarchy of spaces and places is central to the neighbourhood strategy. Creating appealing, attractive places is fundamental to building a special quality of place.

Response:

Comments noted. It is Fife Council's intention to secure environmental improvements via the new development proposed in the Finalised Plan.

Action:

No Change

Comment No: 43

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

If ground conditions and mineral stability issues are to be addressed by opencast consolidation there is opportunity to secure a significant water body creating opportunity for habitat creation, diversity, SUDS and potential recreational uses. This, together with habitat creation, green space provision and the generation of recreational value will create a cluster with the existing Town Loch National Water Ski Facility and Townhill Country Park.

Response:

The detailed land use allocations for new development areas will be dealt with via the Dunfermline and West Fife Local Plan, masterplanning and site development briefs.

Action:

No Change

Comment No: 44

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Brownfield Land

Comment:

I&HB strongly endorses Policy ENV2, for the rehabilitation and reuse of brownfield land, particularly in North Dunfermline, which is appropriate to the location, promotes community benefits, can be environmentally acceptable and sustainable and accords with the Dunfermline SDA objectives.

Response:

Support for Finalised Plan Policy BL1(formerly Draft Plan Policy ENV2) noted. Support for redevelopment of brownfield land in the area north of Dunfermline also noted.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Design Quality

Comment:

I&HB fully endorses the policy aim of promoting design innovation and securing high quality design for built environment. The Structure Plan identifies a number of SDAs that build upon existing communities and quality of place to offer new neighbourhoods and 'urban villages' at the leading edge of urban and community planning. I&HB considers that North Dunfermline can be an exemplar for a number of design pilots with specialist architectural/master plan input. There is also scope for partnership working to secure design quality, including work closely with RSLs.

Response:

Endorsement for policy is noted. Draft Plan Policy ENV3 will be included in Area Local Plans.

Action:

Draft Plan Policy ENV3 will be included in Area Local Plans.

Comment No: 46

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Density

Comment:

I&HB endorses the recommended housing densities of 25-50 dwellings per hectare (Draft Plan Policy H8). I&HB also consider that there is scope for higher density housing (35+per hectare) in North Dunfermline due to the proximity to the town centre and existing and proposed public transport corridors.

Response:

Support noted. The land allocation for the Dunfermline SDA will be identified in the draft Area Local Plan.

Action:

Changes have been made to Draft Plan Policy H8 which is Finalised Plan Policy H6 in response to the wider comments raising concern in respect of the consultative draft policy.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Countryside Access

Comment:

I&HB considers that the North Dunfermline SDA has the potential to extend local park networks in both south-north and west-east directions, and provide improved connectivity to the countryside.

Response:

Noted. The Strategy seeks to integrate new development into the surrounding areas and provide open space linkages such as path networks (see Policy ENV6 of the Finalised Structure Plan). This will be addressed in detail in the new Local Plans, Master Plans and development briefs. Where new developments are identified. Policy ENV8 of the Consultative Draft Plan is now Finalised Plan Policy ENV6.

Action:

Policy ENV8 of the Consultative Draft Plan is now Finalised Plan Policy ENV6.

Mappin Planning and Development, Per Hutcheson Family (Spencerfield Farm), Mappin, Gary - Glasgow

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The owners of Spencerfield Farm, Inverkeithing promote the area for large scale expansion of Inverkeithing that would comprise a mix of uses with a substantial residential component (1000+houses), an educational campus with other uses, leisure uses and community benefits. In general terms, Spencerfield would be complementary to the proposal for Inverkeithing Bay.

Response:

Strategic housing allocations are set out in Proposal H2 of the Finalised Plan.

Action:

A number of changes have been made to the strategic housing allocations as detailed in the Finalised Plan at Proposal H2.

Ritchie Dagen + Allan, Per Torith + Drumoig Ltd, Dagen, Joseph - Dundee

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Torith and Drumoig Ltd object to the Draft Structure Plan and Local Plan because they do not identify land at Drumoig as a housing site or for other future development. This is considered unreasonable because of the existing planning permission for development within the area and the potential to upgrade road infrastructure.

Response:

Objection noted. Drumoig is currently considered to be an unsustainable option for large or medium scale expansion due to landscape setting and its dependence on private transport.

Action:

No Change.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The exceptionally high 40% requirement for affordable housing in the Drumoig area would not be welcomed by the existing residents, who have made their position very clear at consultation meetings in connection with the proposed Structure Plan. Torith and Drumoig Ltd, in recognising this position, are prepared to enter into negotiations in consultation with Fife Council, to acquire a site(s) and build affordable housing in the general area. The proposed constraints for the provision of affordable housing units appear to be too narrow.

Response:

The percentage requirement for the St Andrews housing market area has been revised in line with the recently published PAN 74. In principle, however, Fife Council, and the Scottish Executive, wishes to promote balanced and diverse communities involving provision for a range of housing types and tenures.

Action:

Revise percentage requirement.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Enclosed masterplan proposes a sustainable urban village at Drumoig, with potential for approx.170 dwellings, together with land for a new secondary school and leisure/employment development.

Response:

Noted. Finalised Plan sets 300 houses as base level for strategic allocations. This matter is more properly addressed by the St Andrews & East Fife Local Plan and will be considered in this context.

Action:

Mount Melville Limited, Younger, Michael - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Mount Melville Ltd welcomes the Draft Structure Plan and accepts the need for Fife to realise its full potential, particularly through quality growth opportunities. It supports the recognition of St Andrews as a world-class destination which needs land to be released for employment, housing (including affordable housing) and local facilities. In addition, it agrees there is need for a sustainable greenbelt. It recognises that the Estate's land to the South-West of St Andrews can contribute to this. Finally, it recognises the importance of identifying any shortfalls in community infrastructure and considers it would be beneficial for these to be a reference to developers being involved in the creation of a master plan which should include mitigation strategy.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

In recognising that the Estate's land to the south-west of the town can contribute to the development of the town, notes the requirement of affordable housing as set out in Draft Plan Policy H5 and seeks clarification on how specific needs will evolve through the Local Plan process. However, it is suggested that opportunity exists to provide a range of affordable housing for local requirements. Policy H5 (and possibly Policy H6) may, therefore, benefit from amendments to reflect PAN 74.

Response:

PAN 74 was published after the Draft Structure Plan was approved. It has been taken into account in the Finalised Plan and Supplementary Guidance on Affordable Housing. Agree that the form of affordable housing should be tailored to address local circumstances.

Action:

Change Finalised Plan Policy H4 (was Draft Plan Policy H5) in the light of PAN 74.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Given the limited capacity for brownfield sites in St Andrews, suggest Draft Plan Policy H3 should recognise the benefit that greenfield allocations will make to the overall development strategy and range of transport modes referred to in NPPG17/SPP17.

Response:

Noted. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation to St Andrews reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Supports the approach of the Plan to concentrating rural development within and around core settlements, including St Andrews, in order to secure sustainable communities and sensitive growth and therefore supports the identification of St Andrews as having potential for medium scale development. However, suggests that Policy SS1 should recognise that there will be a need for greenfield settlement extensions. It is suggested that the policy could be amended to read "development shall take place within settlements including greenfield land allocated in Local Plans that adjoin settlements unless there is a justified need..."

Response:

Support for Structure Plan approach noted. Where there is insufficient brownfield land available to meet planned needs, greenfield sites are considered. Local Plans will use guidance in Policy SS1 in determining new settlement boundaries.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

Accept the need for a strategic employment release within St Andrews. The use of land for employment purposes should be linked to local needs and planned developments.

Response:

Acceptance noted. Land will be released for acceptable employment purposes, appropriate to the area.

Action:

John Handley, Handley, John - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Objects to Draft Structure Plan Policy H5. It is considered that the percentages and thresholds for affordable housing provision are excessive, unworkable and unachievable. They are entirely contrary to the advice set out in PAN 74 on affordable housing. The requirement for 45% of all sites over ten units to be provided as affordable housing well exceeds the Scottish Executive's suggested benchmark of 25%. The 45% requirement is therefore not justified and must be reconsidered in line with the advice in the PAN. Similarly the threshold of requiring affordable housing provision on sites of ten units or more greatly exceeds the Executive's suggested target of sites with capacity for 20+ units. Again, this threshold must be reconsidered in line with advice in PAN 74. The requirement that sites with capacity of between 2-9 units should make some form of financial or other contribution towards meeting affordable housing elsewhere is completely unjustified, unworkable and unachievable. The continuation of such a policy is likely to seriously prejudice the delivery of such sites and render most housing sites unviable. This is wholly contrary to the aims and objectives of PAN 74. This element of the policy should therefore be deleted in its entirety.

Response:

PAN 74 was published after the Consultative Draft Structure Plan was approved. It has been taken into account in the Supplementary Guidance on Affordable Housing and the Finalised Structure Plan. The percentage requirements and site thresholds have been adjusted accordingly and in the light of the updated Housing Needs and Affordability Study. It is considered that small sites can make a contribution to meeting affordable housing needs.

Action:

Change percentage requirements and site thresholds in Finalised Plan Policy H4 (was Draft Plan Policy H5) in the light of PAN 74.

The Planning Bureau Limited, Per McCarthy & Stone (Developments) Ltd, Thompson, Philip - Bournemouth

Comment No: 01

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Action Plan

Subject: Affordable Housing

Comment:

Consider that the proposed threshold in Draft Plan Policy H5 has not been properly justified, goes beyond Scottish Executive guidance and does not appear to be based on a rigorous and up to date housing needs survey which assesses all housing needs across Fife and not just those for affordable housing. PAN 74 clearly states that reduced thresholds should only be adopted if exceptional local constraints can be shown. The correct approach that the Council should take in respect of affordable housing is one which closely follows Scottish Executive guidance in PAN 74. Also consider that the percentage figures quoted in Policy H5 are overly onerous. Whilst it is appreciated that there may be need to provide affordable housing within the town it is important that it does not override the provision of housing to meet other needs and it is considered that Policy H5 goes beyond PAN 74 and has not been justified. Policy H5 should also refer to the other factors which will be taken into account in assessing a site's suitability for affordable housing. Site size is an important criteria that should be considered. Affordable housing should only be sought from sites large enough to provide a development capable of encouraging a mixed and balanced community as required from SPP3.

Response:

PAN 74 was published after the Consultative Draft Structure Plan was published. It has been taken into account in the Finalised Structure Plan and also in the Supplementary Guidance. These documents are now consistent with the PAN in terms of percentage requirements and site thresholds. Site size will be taken into account in terms of form of provision. However, PAN 74 is advice and not policy, and need not be followed slavishly. An updated Housing Needs and Affordability Study has also informed the Finalised Plan.

Action:

Change percentage requirements and site thresholds in Finalised Plan Policy H4 (was Draft Plan Policy H5) in the light of PAN 74.

EMA Architecture & Design, Per Thomas Mitchell Group, McIntyre, Ewan - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Markinch Station master plan, submitted for proposed development of a site to the west of Markinch Station, proposes a broad mix of uses, the redevelopment of substantial areas of brownfield land and the regeneration of redundant industrial sites to provide greater employment opportunities in the growing service sector. Contributes to another key objective in making major contribution to the establishment of a major public transport interchange at Markinch Station.

Response:

Proposal noted. Strategic housing allocations are set out in Proposal H2 of Finalised Plan.

Action:

A number of changes have been made to the strategic housing allocations as detailed in the Finalised Plan at Proposal H2.

Colliers CRE, Per Owners Inverteil & Tyrie Farms, Drummond, Martin - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Kirkcaldy West

Comment:

The owners of Tyrie and Invertiel farms seek confirmation from Fife Council that the Kirkcaldy South West allocation will be maintained in the emerging Structure Plan and that Tyrie Farm and Invertiel Farm are suitable locations for a major residential expansion of Kirkcaldy. It is noted that the current proposal is that Kirkcaldy South West should be released only post 2011. It is submitted that the Kirkcaldy West site represents an outstanding opportunity to plan for a longer term expansion of Kirkcaldy together with Kirkcaldy East and that both sites should progress simultaneously through the planned period. It is suggested that a release of 200 house units in Kirkcaldy West and 200 at Kirkcaldy East should be made within the period 2006 - 2011. Are aware that there is need for flexibility and choice with regard to housing land release areas and fully recognise the importance of urban regeneration initiatives. There are however considerable planning benefits associated with the proposals and in particular the creation of a new community consistent with Fife Council's design and wider planning objectives.

Response:

Further consideration has been given to the strategic land allocations in finalising the Structure Plan. No changes have been made to the strategic land allocation at Kirkcaldy SW.

Action:

No change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Kirkcaldy West

Comment:

Have been in discussion with Abertay University, which requires to relocate from Dundee, and discussions are at an advanced stage. The owners of Invertiel and Tyrie Farms have been advised by Abertay University that they would seriously consider Kirkcaldy South-West as a potential location for a further new education/ university campus. Such a development would generate significant local employment and opportunities and would introduce a student population into the town.

Response:

Interests of Abertay University in Invertiel and Tyrie Farm area noted.

Action:

Jarvie, Jim - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Suggest that Draft Structure Plan para 3.49 be amended to include reference to a fast vessel to sail from Rosyth to Kirkcaldy or Burntisland then to Leith/Granton with coach links to Edinburgh. Suggest the service should operate at morning peak times, returning at late afternoon peak times. Commuters living in Perth, Milnathort, Kinross, Dunfermline, Rosyth, Inverkeithing, or West Fife villages, etc. would not travel to Kirkcaldy or Burntisland if working in Edinburgh. Additional park and ride areas could be placed near to the ferry terminal.

Response:

An initial feasibility study into the potential for a Cross Forth Ferry has recently been completed, but further work is required to establish its viability.

Action:

Mathers, Ian - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Agree need to supply more residential land to allow sensible market prices to prevail. Agree tenure and value should be considered in sensible proportions relative to various styles of developments.

Response:

Noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Affordable definition needs to be sufficiently broad to reflect percentage of average value and wide social needs. 25% much nearer the requirement rather than 40%.

Response:

The definition of affordable housing used in the Structure Plan and Supplementary Guidance is consistent with that contained in SPP3 and PAN 74, and reflects a broad range of tenures to suit varying needs. The percentage requirements have been adjusted to reflect PAN 74 and the results of the Housing Needs and Affordability Study.

Action:

Change percentage requirements and site thresholds in Finalised Plan Policy H4 (was Draft Plan Policy H5) in the light of PAN 74.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Existing towns should have sustainable proportional development while recognising the practicalities of the inevitable volume of car ownership.

Response:

This issue has been fully considered in principle in the Finalised Structure Plan and will be addressed in detail through the Area Local Plans.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Infrastructure

Comment:

Appropriate infrastructure is a prerequisite, covering leisure, health, education, transportation, etc. - i.e. prior to/concurrent with development. Recognition of feeder public transport routes.

Response:

The Finalised Structure Plan sets the policy framework to ensure that infrastructure and other services required will be provided at the appropriate time. The issue of public transport network will be addressed via the Local Transport Strategy and Area Transport Plan.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Provision for bespoke urban villages must be considered as a complementary solution to the disproportionate volume of development planned for the existing towns. This would allow masterplanning of the above infrastructure in the correct sequence.

Response:

Policy and Resources Committee of Fife Council which met on 9th January 2003 agreed that a major policy would be to not create any new free-standing settlements in Fife.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Infrastructure

Comment:

A new secondary school in the hub of North Fife locality would improve transport problems and foster community development.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is considered that contemplating that Guardbridge and Leuchars will act as an alternative to St Andrews is hardly credible giving major noise pollution and potential impact on the environment.

Response:

The detailed issues to implement the strategy for this area is considered in the Draft Local Plan.

Action:

Watchman, John - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Para 1.3 should include reference to the members of the Fife Partnership reviewing their estates and making surplus land and buildings available for strategic issues such as affordable housing. Public sector should also contribute to finding solutions for challenges and problems identified in the Local Plan.

Response:

The Local Housing Strategy sets out a range of actions.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Para 1.4 should introduce more flexibility than a 5-year review. The minimum requirement is 5 years as per SPP1, however consideration of a brief annual or bi-annual monitoring statement should be considered in addition to a biennial Action Plan. The other documents referred to in para 1.4 will not be synchronised with the Structure Plan i.e. Local Transport Strategy which is being reviewed in 2005 and there may be strategic proposals that flow from a review of other documents which ought to be reflected in the Structure Plan as soon as possible and not await a 5-year review. Housing needs and the Local Housing Strategy may change significantly within a 5-year period and it may not be appropriate to continue to seek affordable housing requirements in Draft Plan Policy H5.

Response:

Housing land supply is being reviewed on an annual basis and agreement sought with Homes for Scotland. Whilst it is not necessary to synchronise all strategy/policy documents they all have clear links with and take forward the strategy set out in the Fife Community Plan. Draft Plan Policy H5 now Finalised Plan Policy H4.

Action:

Draft Plan Policy H5 now Finalised Plan Policy H4.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

Paras 1.7 and 1.8 should be cross referenced to the relevant provisions of the National Planning Framework for Scotland to provide greater clarity and to aid understanding.

Response:

This approach would require every item to be cross referenced resulting in numerous cross-references throughout the document.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Para 1.8 should refer to whether Fife Council will seek, as part of its strategy to promote Fife as a leisure and/or tourist destination, to identify an appropriate site for one of the 6 national indoor multi-sport facilities. This will provide greater clarity as to whether Fife Council will seek to have the indoor multi-sport facility serving Tayside and Fife.

Response:

The role of tourism is stated in Paragraph 1.16. Fife Council has made a decision not to pursue a bid for the national indoor multi-sport facilities.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Para 1.12 should identify the extent of the over-allocation, the breakdown in different categories including land required as "affordable housing" and holiday, weekend and second homes and why it is thought necessary to allocate in excess of need. This will provide greater clarity, particularly in a context where the aim is to increase the resident population by 20,000 by way of provision of between 18,250 to 21,850 housing units.

Response:

An indication of how the housing will be delivered is set out in Finalised Plan Chapter 3 Para 3.27 to 3.44.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

In relation to para 1.19 and para 3.9, together with Draft Plans Policy H3, suggest that a review should be undertaken to consider whether further development of RAF Leuchars is compatible with the proposed housing allocation of housing units at Leuchars/Guardbridge and whether it is contrary to section 6 of the Human Rights Act 1998 and in particular whether it contravenes Article 8 of the European Convention on Human Rights. Can airport use and housing use sit together acceptably?

Response:

The detailed factors of inter-related land use allocations is an issue for the Area Local Plans to address.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

The description of and reference to a 'Campus Plan' should be inserted into para 1.21 to clarify what the campus plan is.

Response:

It is considered the term is self-explanatory.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Comment refers to para 1.24 in addition to paras 3.39 to 3.43 and Draft Plan Policy H5. Affordable housing can be properly addressed as an issue in the Structure Plan. The draft Structure Plan needs to be reviewed to incorporate an appropriate Action Plan as per SPP3, para. 62.

Response:

The Structure Plan is accompanied by an Action Plan, which has been updated and finalised.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

With regard to paras 3.39 to 3.43 and Draft Plan Policy H5, the level of detail in the draft Structure Plan appears inappropriate. The detail of 'affordable housing' provision such as those in Policy H5 and any underpinning supplementary guidance should be considered as part of a Local Plan process and not as part of a Structure Plan process.

Response:

Disagree. Affordable housing is a strategic issue in Fife requiring detailed strategic policy.

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

In relation to paragraphs 3.21-3.27 and the relevant policies and proposal, the provision should be reviewed having regard not only to quantitative capacity, but also qualitative capacity, and the 'key objective' of reducing the level of non-food leakage from Fife. Consider that the particular case of St Andrews should be reviewed. It is identified as a District Centre and additional retailing should not simply be dismissed on the basis that the town centre has important heritage and limited capacity for further retail development. If there is no capacity to develop within St Andrews, then edge of centre and out of centre sites to meet retail needs should be considered.

Response:

Support for improvements mentioned in Paragraph 3.30 - 3.32 of the Finalised Plan. Support for town centres including St Andrews is mentioned in Policy S1. The plan therefore does not dismiss new retail development in the town. Site/area specific proposals however require to be examined in detail. Sequential approach supports principle of edge of centre sites if no town centre sites available.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Policies SS1 and DC1 should be reviewed to accord with Circulars 12/1996 and 4/1998. The general thrust of the Draft Structure Plan is to seek developer contributions that may not be relevant to planning, disproportionate to proposed developments or that are otherwise unreasonable. The basic requirements of Circulars 12/1996 and 4/1998 are that any planning agreement and any planning condition must be relevant to planning, proportionate to the development proposed and reasonable in all other respects.

Response:

Policies SS1 and DC1 set broad policy frameworks for development. Detailed discussions will follow once the process has advanced via the Area Local Plan, Master Plans and development briefs. It is considered that the Plan does meet national guidance and advice.

Action:

No Change

Comment No: 12

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The Plan text and policies on Housing and Design Quality should be reviewed to provide a more appropriate, proportionate, sustainable distribution of land allocations amongst the Local Plan areas and in light of PAN74. The St Andrews & East Fife Area is not provided for adequately or proportionately in relation to Mid and West Fife. The proposed allocation for Leuchars/Guardbridge should be reviewed in light of concerns about the compatibility of housing development with increased from RAF Leuchars. This allocation, together with that of the Tay Bridgehead, should be reviewed in light of the strategic aspiration to stem population loss from Dundee.

Response:

The Plan has been reviewed in light of PAN 74, which was published after the Consultative Draft was published. The housing land requirement has been reviewed and revised for the Finalised Structure Plan. St Andrews and Cupar are identified as Strategic Development Areas. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The Area Local Plan will identify specific sites to meet this need, taking into account of the proposed Green Belt boundaries. This is a reduction from the consultative draft Structure Plan, which identified between 1,000 and 1,800 houses over the same period. A further 1,450 houses are proposed at Cupar, an increase from the consultative draft Plan which identified 600-1,000 houses. These changes have been made in response to the comments received.

Action:

St Andrews allocated 1,200 houses and Cupar 1,450 houses in Finalised Plan Proposal H2.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Policy H3 should be amended to give preference to brownfield sites wherever they are located (not merely within settlement boundaries) over greenfield sites, to facilitate the reuse of brownfield land and promote the removal of problems associated with such land. This comment should be cross referenced to para 4.30-4.32 and Policy ENV2.

Response:

Draft Plan Policy SS1 of the Finalised Structure Plan is clear in promoting development of brownfield sites and is supported by Policy BL1 (formerly Draft Plan Policy ENV2).

Action:

Addition of Policy BL1.

Comment No: 14

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The recognition in Draft Plan Policy H6 that non-residential development can make an affordable housing contribution should be retained.

Response:

Policy H6 has been deleted from the Finalised Structure Plan. However, a text reference to this issue is retained. In certain circumstances non-residential development may be able to contribute to addressing the shortage of affordable housing.

Action:

Delete Draft Plan Policy H6.

Comment No: 15

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

With regards to paras 3.45-3.52 and the policies and proposals referred to therein, they should be reviewed in the light of the 2005 review of the Local Transport Strategy.

Response:

The Finalised Structure Plan is consistent with the review of the Local Transport Strategy.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

Draft Plan Policy E4, with its commitment for a sequential approach for hotel and commercial leisure development, is supported.

Response:

Support noted, however Draft Plan Policy E4 will be incorporated into Local Plans and has been deleted from the Finalised Structure Plan.

Action:

Draft Plan Policy E4 moved to Area Local Plans.

Comment No: 17

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Brownfield Land

Comment:

Draft Plan Policy ENV2 should be reviewed to conform with the definition of brownfield land in SPP3, as it currently suggests that brownfield land only consists of derelict or vacant land.

Response:

Disagree. The definition contained in the Glossary of the Finalised Structure Plan is comprehensive and is also consistent with the Approved Structure Plan.

Action:

Draft Plan Policy ENV2 now renamed Policy BL1 in Finalised Plan.

Comment No: 18

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

A number of items in the Glossary, should be deleted as the definitions are not used in the main text.

Response:

Unnecessary definitions will be deleted.

Action:

Update glossary entries.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

All glossary defined terms should be underlined in the text so that the reader is aware that the term is defined and can, in turn, look up the definition.

Response:

This is not considered to be necessary.

Action:

No Change

Comment No: 20

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

The glossary definitions of a brownfield site, edge of centre, effective housing supply, established housing supply, greenfield site, housing land requirement, housing market area, out of centre, and sustainable development should be redefined to accord with Scottish Planning Policy. Glossary definition of Section 75 Agreement should have the deletion of "control" through to "system" and inserted as a substitute "restrict or regulate the development or use of land" in order to properly reflect the statutory provision. The glossary should be further amended to insert definitions of Central Fife, Mid Fife, East Fife and West Fife as it is not clear whether Mid Fife and Central Fife are the same.

Response:

The glossary definitions are to assist the reader but do not constitute legal definition of the word or phrase.

Action:

Update the plan. *Comment No:* 21

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

A new definition of Information and Communications Technology should be inserted to accord with Policy C2. A new definition of Best Practicable Environmental Option should also be inserted on the basis of the definition in NPPG10.

Response:

The glossary definitions are to assist the reader but do not constitute legal definition of the word or phrase. Draft Plan Policy C2 incorporated into Finalised Plan Policy C1.

Action:

Draft Plan Policy C2 now part of Finalised Plan Policy C1.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Policy H5 of the Draft Structure Plan (Affordable Housing) requires to be completely reviewed in the light of the recently published PAN 74. Suggests that reference be made to Policy HOU7 of the approved Edinburgh and Lothians Structure Plan 2004.

Response:

PAN 74 was published after the Consultative Draft Structure Plan was published. It has been taken into account in the Supplementary Guidance on Affordable Housing and in the Finalised Structure Plan.

Action:

Change Finalised Plan Policy H4 (was H5).

Evans, David - Upper Largo, Leven

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

The desire to enlarge the service sector/knowledge-based economy to replace the declining industries is considered to be a most sensible approach. However, involvement in such a company has indicated problems with recruiting people to Fife, one of the biggest problems being location. The perception of Fife is that it is remote and lacking in infrastructure. To some extent this is just a perception but there are also some grounds for this view and these are addressed to some extent in the Plan. Success in enlarging the knowledge-based economy will come if the strategy recognises realities such as these and bases the growth around the centres of St Andrews and Edinburgh. Environmental improvements in Mid Fife could lead to growth in commuting to Edinburgh. Whilst not bringing employment to Fife directly, this would assist in revitalising communities. Provision of employment sites with good links to Edinburgh could bring employment, particularly if sites were more cost-effective than in the Lothian area.

Response:

Strategy seeks to address the issues raised in this comment. The National Planning Framework recognises that Fife has a role to play in growing the Scottish Economy and that it is part of the West Edinburgh/South Fife identified as a key economic development zone.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Strongly support proposals to improve transport links across the Forth. The bus based Park and Ride system is held back by the fact that buses crossing the bridge are subject to the same congestion as other traffic. A rail link from the Park and Ride to the centre of Edinburgh with, say 4 stops on the way, (hopefully including the airport) would be appealing. Encouraging and supporting more use of Dundee is desirable. Alternative Forth crossing points are needed. Particular welcome is given to the idea of operating a ferry between Kirkcaldy and Leith.

Response:

Support noted. There are no bus priority measures on the Forth Road Bridge but on both approaches there are bus priority lanes. Fife Council is working in partnership with the Forth Estuary Transport Authority and the South East Scotland Transport Partnership to develop proposals to further improve public transport choices for Cross Forth travel.

Action:

McIver, Iain - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

The proposed growth of population to 370,000 by 2026 would be twice the rate of growth experienced in the last 20 years and is in sharp contrast to the GRO prediction for Scotland. Without this increase, the natural movement would be for population decline and consequentially migration would need to reach 1500 people per annum if the 2026 target is to be met. Consider that Dundee Council is questioning and criticising this strategy, which will adversely affect the city and result in additional pressure on the Tay Road Bridge. It is possible that Fife will become a less attractive place to live and commute from as congestion on the Forth crossing increases.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

In regard to para 1.14, consider that the term "medium-scale growth" is totally misleading. St Andrews will experience large-scale growth with other larger towns having medium growth by comparison. To define the growth rate in absolute terms i.e. number of houses as opposed to more accurate percentage basis, is totally flawed and seriously misleading.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

In relation to paras 2.5 and 2.6, reference to large/medium scale development is misleading. The comparative scale of development should not be in percentage terms, that is to say the increase in current housing stock, and not in absolute terms. An additional 1,000 houses built in St Andrews will have 3-4 times impact of the same number built in Dunfermline, Glenrothes or Kirkcaldy. The methodology requires revision.

Response:

Disagree. It is considered that it is a uniform approach which was used consistently throughout the Draft Plan. Allocations made in the Draft Plan have been revised and are now included in Finalised Plan Proposal H2.

Action:

Revised included in Finalised Plan Proposal H2.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

In relation to Draft Plan para 3.35 and Policy H2, the definition of large and medium scale is very misleading. This methodology takes no account of current size of towns and present housing stock. A percentage basis would be a much more accurate reflection of likely impact of new developments.

Response:

Noted. Strategic Development Areas and Other Strategic Housing Allocations are clearly identified in the Finalised Structure Plan at Proposal H2.

Action:

Finalised Plan Proposal H2 to show all strategic housing allocations.

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

With regard to Policy ENV1, consider that this is a very weak policy, which virtually encourages development on what has been perceived by several landscape experts as the natural Green Belt around St Andrews.

Response:

Disagree. Policy ENV1 does not encourage development.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

With regards to Draft Plan Policy H5, questions how Affordable Housing can be "indistinguishable from other forms of housing" if built at a fraction of the cost and mixed in with "the high end of the executive market".

Response:

This is an aspirational aim which is consistent with PAN 74. It is acknowledged that it will not be possible in all cases, but Fife Council wishes to encourage high quality, mixed and integrated development. Draft Plan Policy H5 now Finalised Plan Policy H4.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Draft Plan Policy H6 should apply to St Andrews University, but will it?

Response:

This is not a strategic issue and as such is more properly addressed by the St Andrews and East Fife Local Plan. Comment will be considered in that context. In the event Policy H6 has been deleted from the Finalised Structure Plan and Supplementary Guidance on Affordable Housing although text references to affordable housing and non-residential development remain,

Action:

Delete Draft Plan Policy H6

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Infrastructure

Comment:

The area approaching the junction of Strathkinness High and Low Roads in St Andrews is subject to constant flooding, even in periods of average rainfall. If the present system cannot cope, how will it cope with further proposed development in this area?

Response:

Finalised Structure Plan Policy SS1 requires the issue of flooding to be addressed in the process of allocation of land for development. Flooding outside urban areas is not an issue addressed by Fife Council.

Action:

No Change

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The reference in Fife in 2026 at para 4, which mentions that communities like Inverkeithing and Methil are now home to an increasing number of affluent commuters from Edinburgh is an error or simply wishful thinking.

Response:

Disagree.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Suggest that exceptions to the 45% rule mentioned in Draft Plan Policy H5 will be a 'get out' clause for developers who will exploit it vigorously. The application of this percentage in St Andrews is bound to be contested vigorously by developers and will no doubt be reduced considerably under pressure from them.

Response:

Disagree that exceptions will be "a get out clause". Draft Plan Policy H5 now Finalised Plan Policy H4

Action:

Revise Finalised Plan Policy H4 (Draft Plan H5).

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

It is noted that the last paragraph of Policy H5 refers to successive occupiers, and question why there is no mention of successive buyers. This is a must if houses are to remain affordable, whatever the tenure, for a lengthy period (e.g. a minimum of 20 years). Every other option for providing affordable housing should be explored or exhausted before resorting to allowing developers to build expensive profitable houses in return for a percentage of affordable homes.

Response:

The policy approach taken is well thought out and has been developed taking account of good practice within the UK. Reference to "owners" will be inserted into Finalised Plan Policy H4 (was H5).

Action:

Change Policy H4 (was H5) and Policy AH1 of Supplementary Guidance to include the word "owners".

Henderson, David - Kirkcaldy

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: City Region Planning

Comment:

In relation to Preface para 5, questions if the full impact of City Region Planning has been considered in drawing up the 20 year blueprint for Fife.

Response:

Cross boundary issues have been considered in preparing the strategy which has also taken full account of the National Planning Framework 2004. The Finalised Structure Plan also takes full account of the Planning White Paper.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

In relation to para 1.3, bullet point 2, this is only one way of addressing congestion. Creation of sustainable employment opportunities within Fife is another essential feature, which seems to be attracting scant attention.

Response:

Finalised Plan sets out a significant commitment to identifying land for employment generating purposes.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

With regard to paragraph 1.8, which refers to integration of South Fife within the West Edinburgh development area. Questions whether this is an admission that the Dunfermline Eastern expansion was only justified by the employment opportunities across the River Forth. There is, a further risk that the entire A92 corridor will become a dormitory extension of Edinburgh.

Response:

The plans for the Dunfermline Eastern Expansion were set in the Fife Structure Plan 1994. Finalised Plan clearly focuses on development-led regeneration in Mid Fife in a controlled manner.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

With regard to para 1.22, this implies that present standards are not good enough and encourages travel to work. Bring the jobs nearer to the population.

Response:

Finalised Plan sets out a significant commitment to attracting employment opportunities to Fife to attract jobs nearer to the population and to providing an environment to encourage existing businesses to expand.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

In relation to the last sentence of para 1.28, assurance sought that this principle will apply across Fife and not just in the towns mentioned in this paragraph.

Response:

Paragraph 1.28 is applicable to the whole of Fife.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

Policy SS1 should be amended at the 5th bullet point in the last column by deleting the word "development" and inserting "infrastructural". In addition, should be amended at bullet point 6 in the second column by the deletion of "maximised" and insertion of "achieved".

Response:

Suggestions noted. Policy SS1 has been reviewed in finalising the Plan. Developer Contributions are addressed in Policy DC1 and Proposal DC1 .

Action:

Amend Policy SS1.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

With regard to paragraph 3.4, line 10, the word "expressed" should be deleted and replaced with "identified".

Response:

Disagree. The identification will be completed through masterplans.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

With regard to Policy DC2, it is questioned why there is no intention for the provision of affordable housing within the Kirkcaldy East area.

Response:

The requirement for affordable housing is now set out in the Supplementary Guidance on Affordable Housing. Finalised Plan Policy H4 (Draft Plan Policy H5) deals with affordable housing. Draft Plan Policy DC2 now Finalised Plan Proposal DC1.

Action:

No Change

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

With regard to Policy S2, seeks clarification that all conditions listed will apply.

Response:

All the conditions set out in Policy S2 will be material considerations.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

With regard to paragraph 3.32, suggest that the statement relating to inward migration is in conflict with Policy SS1, which seeks to reduce the need to travel by private car.

Response:

Disagree. Strategic Development Areas are focused primarily on urban areas where most homes, jobs and services are already located, and opportunities are created to deliver public transport improvements and reduce the need to travel.

Action:

No Change

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The reference to "non-residential development" within this section is not consistent with the main heading - Residential Development.

Response:

This policy has been deleted in the Finalised Plan. However, a text reference is retained. The term "non-residential" refers to the nature of the main development to which a requirement for affordable housing would be linked.

Action:

Delete Draft Plan Policy H6.

Comment No: 12

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

With regard to Draft Plan Policy H5, the words "provision of high quality" is not a realistic statement. Suggests that "good quality" or "value for money" might be more accurate.

Response:

It is part of the Finalised Structure Plan strategy to promote high quality design but it is recognised that this is an aspirational aim. The term "value for money" does not necessarily equate to good or high quality. This approach is supported by PAN 67. Draft Plan Policy H5 now Finalised Plan Policy H4.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Aggregates

Comment:

In relation to Policy M2, the word "encouraged" should be replaced with "required". Further clarification is sought to the type of projects to be supported by the fund.

Response:

Disagree. Policy should retain word "encouraged". Detailed information must await approval of policy and the establishment of Trust Fund.

Action:

No Change

Comment No: 14

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Waste Management

Comment:

With regards to Policy W1, the presentation of this policy statement is confusing. Some clear way of stating the alternatives and combinations is needed for the sake of clarity to avoid legal dispute in the future.

Response:

Agree. Policy W1 will be revised to provide strategic waste management guidance and Local Plans will provide more detailed policy guidance for assessing proposals in detail. Proposal PW1 will be deleted.

Action:

Delete Proposal PW1 and revise Policy W1 in Finalised Plan.

Comment No: 15

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Design Quality

Comment:

With regard to Draft Plan Policy ENV3, the semi-colon between "should" and "achieved" should be removed. Considers that the desire "to maintain and raise" design standards throughout Fife cannot be achieved and suggests that part of the second paragraph from "to" through to the word Fife be deleted.

Response:

Agree to deletion of semi-colon. Disagree to other revision as this explains the reason for compliance with the Urban Design Guide. Draft Plan Policy ENV3 will be included in Area Local Plans.

Action:

Draft Plan Policy ENV3 will be included in Area Local Plans.

Jardine, Ewen - Freuchie, Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

The increase in population proposed to 2026 of 20,000 is in excess of the forecast by the GRO of 4,600. The assumption behind the Plan's population growth projections are questioned as most of it is to cater for commuters from outwith Fife which would be contrary to sustainability policy. Proposed development elsewhere in Edinburgh, in the Scottish Borders and Dundee will detract from Fife, as will the congestion experienced at the Bridgehead. There is a need to provide for more employment opportunities in Fife to ensure sustainable growth and this is welcomed. However, Fife should only cater for growth on a moderate scale as the population increases envisaged are unlikely to be sustainable.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Questions the population statistics and assumptions for the allocation of houses to St Andrews and East Fife Local Plan Area in view of the fact that the boundaries of East Fife administrative area and the Local Plan are no longer coterminous. The requirement and shortfall statistics for housing land are questioned. The East Fife Local Plan shows a surplus of 577 houses to 2009, yet Schedule H1 2006-2026 of the Structure Plan shows a shortfall of 980 houses.

Response:

Concerns noted. The allocations were made on the basis of the revised Area Local Plan boundary. The Local Plan period and the Structure Plan period are not the same therefore the figures must also be dissimilar.

Action:

Demographics work has been updated, the details of which are contained in the Report of Survey.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Market Areas

Comment:

There is confusion as to where Cowdenbeath, Kelty and Lochgelly are placed, whether they are in Dunfermline Housing Market Area or within Mid Fife.

Response:

The settlements are included in the Dunfermline Housing Market Area. A plan showing Housing Market Areas is included in the Report of Survey.

Action:

Include maps in Report of Survey.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

With regard to Draft Plan Proposal PT2, consideration should be given to linking the Rosyth Ferry terminal with the M9 near Stirling and the M90 by a dual carriageway. This would attract traffic to the port from West Scotland and reduce traffic using the Forth Bridge. Future ferry links with Northern Europe to Gothenburg, Bergen and the Baltic may become feasible in the next 10 years.

Response:

Suggestion noted but this would be an issue for the Scottish Executive to consider. There is scope for additional ferry services to use the facilities at Rosyth. Draft Plan Proposal PT2 now Finalised Plan Proposal PT1.

Action:

Draft Plan Proposal PT2 now Finalised Plan Proposal PT1.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Rural Economy

Comment:

Much of North East Fife is classified as "accessible rural" by the Scottish Executive. Fife should seek to ensure the sustainability of rural communities by encouraging employment opportunities. At present policies encourage businesses to move from rural communities. Land formerly used for employment obtains a significantly higher price for its owner if sold for residential development. There is a need to reduce commuting. It is suggested that there should be a hierarchy for brownfield sites and employment sites that requires that the land should be used: for the same purpose as previously; for employment; for affordable/sheltered housing; and as mixed use. Only after all efforts to provide such uses should commuter-led housing be considered. It is important to consider the economic, environmental and social implications of sustainability.

Response:

The Finalised Structure Plan and associated documents seek to ensure sustainable communities by encouraging local employment opportunities. Fife Council, in conjunction with other agencies, seeks to retain existing employers. The St Andrews and East Fife Local Plan reviews in detail the use of land and makes appropriate allocations/re-allocations.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

Whilst Green Belts are identified for Dunfermline and St Andrews, no mention is made of measures for safeguarding Areas of Great Landscape Value and Conservation Areas.

Response:

It is anticipated that there will be revisions to the scheme for protecting the landscape and it is possible that the designation "Area of Great Landscape Value" may become obsolete during the life of Plan. Local Plan reviews will consider landscape policy. Conservation Areas are safeguarded by national legislation and also by planning policy set out in the Area Local Plans.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Forestry

Comment:

The Scottish Forestry Strategy 2000 sets out the guiding principle of sustainability and meeting the needs of future generations. The Report of Survey outlines the importance of forestry to Fife and para 4.41 in the Structure Plan does not communicate this as well as it might. Considers that Fife should take a lead, encourage forest managers and ensure that a minimum of 80% of its forests and woodlands are certificated to Forest Stewardship Council or similar standards. This would promote the best management of Fife's forests.

Response:

The Indicative Forestry Strategy encourages pro-active approach to forestry but Fife Council has no powers to enforce actions.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Draft Plan Policy H5 - confusion over where Cowdenbeath, Kelty and Lochgelly are placed - Dunfermline HMA or Mid Fife.

Response:

Noted. They are part of the Dunfermline HMA, but fall within the Kirkcaldy and Mid Fife Local Plan area. Clarification is provided by revised Finalised Plan Policy H4 which replaces Draft Plan Policy H5.

Action:

Revise Finalised Plan Policy H4.

Robertson, Alastair - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The primary objective of the subject of the Plan (i.e. regeneration of Mid Fife and West Fife) is supported. However, the implementation of the Plan is only possible if sufficient funding is available and should be clearly indicated in the Plan or supporting documents to assist understanding.

Response:

Support for planning objective noted. It is considered that the requirement for adequate funding at the appropriate time is clearly mentioned in all of the appropriate documents.

Action:

Valantine, Gilbert - Wormit, Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Considers that it is a misguided objective to aspire to a 5% growth in population over 20 years. Considers that quality and sustainable communities can be achieved by either population contraction, expansion or the status quo, and there is no need to presume that the population growth is necessary for improvement or development.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

There need be no presumption that "economic growth" is necessary for quality development, as argued by Central Government, without any analysis of improvement in quality of life. Any economic output increase regardless of whether it is good or bad for quality of life is regarded as positive because it increases the alleged wealth output. It is questioned why this approach should be followed.

Response:

The Finalised Structure Plan's strategy is balanced and is aimed at seeking economic growth together with improvements to the environment and quality of life.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Considers that Fife Council should concentrate on development programmes to improve quality rather than quantity. There is no logic in the notion that population growth will engender good development, as this leads to a bigger problem of mediocre quality and dubious value. To have growth in the population and economy as your central guiding principle is fairly meaningless to development and unimaginative. Questions the aim to attract more people to Fife, rather than sustaining current residents to a higher standard than at present, which would be an equal or better goal.

Response:

Finalised Plan strategy includes a strong agenda to improve the quality of Fife's built and natural environment. It is considered that there is great benefit to be obtained by seeking to grow Fife's population and economy. The Fife urban design guide "Creating a Better Fife" clearly sets out the need for high quality design in new developments.

Action:

Spackman, S G F - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

The strategy of reversing the population decline of Fife by building houses is fundamentally flawed because it is based on current population projections that are simply guesses.

Response:

The Finalised Plan strategy is not based on projecting current trends forward. The strategy takes a pro-active approach to securing population growth and improving the Fife economy.

Action:

Demographics work has been updated, the details of which are contained in the Report of Survey.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

The strategy of reversing the population decline of Fife by building houses is fundamentally flawed because the projection of housing need is based on no research or local knowledge, but on a combination of an imposed national methodology and developer proposals. They remain therefore a series of aspirational assertions based on no evidence.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

The problem of population decline is national and local, rather than regional. Within Fife, the population decline of Mid Fife cannot be reversed by further growth in east and west Fife (or more specifically in St Andrews and Dunfermline).

Response:

Agreed that further population growth in East and West Fife will not address the decline in Mid Fife. The thrust of the Finalised Plan is clearly to address the problem. However, the future of East and West Fife for the period 2006-2026 cannot be ignored.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

The strategy of basing Regional economic drivers in certain locations or special groupings of locations is wishful thinking. The development of "St Andrews World Class" has two components - tourism and the knowledge economy. With the decline of the traditional Scottish seaside holiday the tourism component is overwhelmingly golf-related. Golfers come to play St Andrews courses, they do not come to play the "Fife courses". Similarly, the knowledge economy eastern corridor identified in the Plan runs from Aberdeen to Newcastle - not into West Fife. A genuine strategy would seek to relate developments elsewhere in Fife with the sector leadership already established in St Andrews.

Response:

St Andrews is well known and will draw people into Fife to visit a range of attractions, including other golf courses. The concept that the growth of the knowledge economy could result in the creation of major employment opportunities elsewhere in Fife is acknowledged.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

In general, the Structure Plan is the wrong way round. It assumes that if population grows, various economic and social benefits will follow, but the real causal relationship is the reverse - if there are good infrastructure and services then people will a) come and b) stay. The confused thinking behind the Structure Plan is illustrated by its language, with its repetitive slogans and constant recourse to jargon.

Response:

Disagree. The Finalised Plan seeks to drive change to achieve population growth with economic and social benefits.

Action:

Douglas, Peter - Newburgh, Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Para 2.4 refers to the Coastal Regeneration Zone, which is roughly 3/5ths of Fife's North Sea coast. No bullet point relates to the remaining 2/5ths of the Fife coastal line and this omission should be rectified.

Response:

Not appropriate to include the whole of the coast in the Coastal Regeneration Zone, as it may not accommodate the scale of development being proposed and not have brownfield sites, in common with the Coastal Regeneration Zone.

Action:

No change.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

In relation to para 3.17 and Proposal PE1, note that there is a great deal of words but little action. It is not clear how it is proposed to sustain communities and provide local employment. Whilst there is acceptance of an industrial site at Cameron, there are no proposals for housing to enable people to live near to jobs. Much of the land at Cameron is low grade and ideal for housing, and housing allocated to St Andrews could be relocated there.

Response:

Proposal PE1 addresses strategic employment land. It will be implemented via the St Andrews and East Fife Local Plan which makes more local site specific allocations for new developments.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

Proposal PE1 mentions clusters. Cameron wishes to cluster and it is queried whether Fife Council seeks to obstruct or help this being achieved.

Response:

In the context of Proposal PE1 the term cluster means a group of inter-related settlements in close proximity to each other (which could eventually benefit from different facilities located in the different settlements). Fife Council wishes to promote employment land in rural clusters. Site specific issues will be addressed in the St Andrews and East Fife Local Plan.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

Draft Plan Policy E2 requires to go a little further. Supports the acceptance of the development of brownfield land in rural areas. However, the range of land and its profitability has not been mentioned. The use of land at Cameron for housing and industrial uses would do much for the local economy and take a little of the pressure off St Andrews.

Response:

Draft Plan Policy E2 addressed more local employment land issues. Consequently it has been deleted from the Finalised Structure Plan and will be incorporated into Local Plans.

Action:

Delete Draft Plan Policy E2.

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Fully agree with paras 4.6 and 4.7 of Draft Plan. In relation to para 4.8 of Draft Plan, windfarms and individual turbine proposals should be considered in conjunction with whether there is an adequate other source as backup for the non-generating periods. There is no mention of this absolute need in Policy R3 of Draft Plan.

Response:

The issue of back up for site specific proposals could be considered on an application by application basis. A reference to absolute need could potentially restrict amount of energy generated by renewable technologies. The UK and Scottish targets for 2010 and 2020 are minimum requirements rather than limits on the scale of development. Draft Plan Policy R3 now Finalised Plan Policy R1.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Brownfield Land

Comment:

The exclusion of large-scale housing development as an after-use for Crail airfield is not fully explained. Considers that this is an ideal sterile site which meets all policy qualities and should not be ruled out without reason. Locally it is recognised that all the Crail problems are related to the road access to this site. Another road can only be funded by a large scale development of the site.

Response:

Current proposals to develop Crail Airfield for large scale residential use is not consistent with overall strategy which promotes new development as per Policy SS1 and Policy SDA1. However, consideration of small scale residential use is set out in para 2.6 of the Finalised Structure Plan. This will be taken forward through the St Andrews and East Fife Local Plan.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Sustainability

Comment:

Disappointment with 4.42 and 4.43 as the policy speaks of enhancing and sustaining rural communities yet the de-population of the Cameron area is well charted. This can only be addressed by providing houses together with land for employment uses.

Response:

This is an issue to be addressed by the Area Local Plan.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Forestry

Comment:

With regards to Draft Plan Policy ENV7, it is hoped that the discouragement of the planting of exotic species will feature and the encouragement of native species will be strongly pursued.

Response:

Fife Council has no powers to control species planted. Draft Plan Policy ENV7 is now Finalised Plan Policy ENV5.

Action:

Draft Plan Policy ENV7 now Finalised Plan Policy ENV5.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The 45% affordable provision outlined in Policy H5 for St Andrews is not sustainable. The Scottish Executive consider 25% to be the benchmark. The requirement for St Andrews should not be below 25% and perhaps 33% should be possible.

Response:

PAN 74 was published after the Consultative Draft Structure Plan was published. It has now been taken into account, along with the updated Housing Needs and Affordability Study in the Finalised Structure Plan and Supplementary Guidance. The percentage requirement for the St Andrews housing market area has been reviewed and it is now 30%.

Action:

Change percentage requirement in Policy H4 (was H5).

Melville, Frances - Cuparmuir, Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

With regard to para 1.14, delete the reference to St Andrews as a world class destination, as it is in fact an international tourist destination.

Response:

The reference to world class indicates an intention to seek to improve the town's international standing.

Action:

No Change.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The reference to St Andrews as having capacity for medium-scale growth should be replaced with "St Andrews has a capacity for limited growth" as per the approved Structure Plan. The scale of proposals in the Draft destroys the very essence of the green belt which is to encircle the town of St Andrews.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Delete "world class" from para 1.16 for the reasons stated in comment no. 01. There are many organisations and bodies all working for this aim - the connotation of world class refers to a body which is not elected and not accountable.

Response:

The reference to world class indicates an intention to seek to improve the town's international standing as a tourist destination. Comment re St Andrews World Class organisation noted and reference in Finalised Plan para 1.16 revised.

Action:

Finalised Plan para 1.16 revised.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

With regard to para 1.19 and RAF Leuchars, text should read "to work in partnership with RAF Leuchars and review changing opportunities should they arise".

Response:

Reference to RAF Leuchars is deleted.

Action:

Delete reference to RAF Leuchars.

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

With regard to para 1.21, the education details are vague. Concern that the Schools Estates vision report, which is still to be considered by Fife Council, will not be available for the public to respond in these draft plans prior to the end of the consultation period. The future of education is a vital component for any Structure and Local Plan document.

Response:

Agreed that education is a vital component and this is being addressed via the Schools Estate Strategy which is undertaking a review of the delivering of the education services for the whole of Fife. It is intended that school places will be provided timeously to meet the planned growth in population.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Considers re para 1.26 that the figures quoted for population growth of 5% are unrealistic. A more realistic figure should be based on, at most, a growth of 2.5%. It is noted that on the basis of the information supplied by the Registrar General, the population of Scotland has only increased by 1/2% over the period 2002-2005. In the longer term, the population of Scotland has decreased over the last 20 years and it is questioned how it can be expected to increase by 5% over the next 20 years.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth is sustainable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change.

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

How can Fife Council protect the landscape setting of the historic cores of Dunfermline and St Andrews and at the same time accommodate high quality growth (para 1.29)? Consider that this statement is a complete contradiction and requires to be completely re-written and reconsidered.

Response:

Disagree. The boundaries of the development areas and Green Belt will be defined through Area Local Plans.

Action:

No change.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

The Draft Plan makes the existing Structure Plan look good. The St Andrews Strategic Study 1998 is still a sound document which recognised the development pressures on the town, and after considerable community response, the options included in the Study were for limited growth to the South West and the need for affordable housing and that should be protected. Study also acknowledged the need for the University to develop, and for a Green Belt - reference to "World Class Destination" in para 2.7 should be deleted. The paragraph conflicts with approved Structure Plan Policy SS8 which seeks to "prevent large-scale urban expansion and coalescence." Proposes restoration of Policies SS8 and B2 of the approved Structure Plan.

Response:

The 1998 Study was to inform the replacement, approved in 2002, for the 1994 Structure Plan. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements. A Green Belt for St Andrews is delineated in the draft Area Local Plan and this will be revised to extend the Green Belt coast to coast in the Finalised Area Local Plan. Reference to the St Andrews World Class organisation, the locally driven partnership has been deleted. Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which also identify the boundaries.

Action:

Policy and text amended.

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

With regard to Policy H1, it is unclear how requirements for the St Andrews area have been derived, as there appears to be no correct population information available as a basis for deriving these figures. The increase in the 2006-2011 housing land requirement for East Fife from nil in the Adopted Plan to 980 in the Draft Plan is not explained.

Response:

The Report of Survey clearly outlines how the housing land requirement is calculated, based on GRO Population and Household Projections. The nil housing land requirement 2006-2011 shown in the Adopted Structure Plan 2002 was based on information available at that time. Significant changes have since taken place in household projections, migration, etc., which require the provision of land for new development for that period.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

PAN38, para 16 states that household projections issued by the GRO, while providing planning authorities with a useful starting point in assessing future requirements "...it must be recognised that they are projections based on past trends, rather than predictive forecasts..." A plan for 20 years is too long, 10 years is much more manageable and comprehensible.

Response:

Noted. It is acknowledged in the Report of Survey that the household projections are based on past trends. The current figures are based and cover the period to 2016, beyond which they have been extrapolated. The biennial publication of updated figures is taken into account in monitoring the Structure Plan and will influence the interim review of requirements by 2009. The 20-year Plan period reflects guidance in SPP3 and the Community Plan's long-term vision.

Action:

No Change

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Policy ENV1 is not strict enough and does not have the control of the existing Structure Plan Policy SS8, which makes a presumption against development in St Andrews and Dunfermline. The previous policy has been completely ignored in the St Andrews and East Area Local Plan proposals and Fife Council has also ignored much of what is stated in the landscape capacity assessment for St Andrews. The Draft Structure Plan should retain existing policy for green belts, SS8, as the ethos of the Draft Plan appears to be developer-led.

Response:

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries.

Action:

Policy and text amended

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Density

Comment:

Draft Plan Policy H8 seeks to increase the number of houses to be developed per hectare. Increasing the density from the approved Plan will not achieve the aim of avoiding uniform density development. The density requirement should not be increased from that in the currently approved Structure Plan, of between 20-35 houses per hectare. It is considered that many modern housing developments result in site cramming.

Response:

New residential development should make the most efficient use of land and best practice shows that higher density standards would result in lowering of greenfield land requirements without any loss of residential quality. The Fife Urban Design guide "Creating a Better Fife" gives further guidance as to how this can be achieved.

Action:

Changes have been made to Finalised Plan Policy H6 in response to the wider comments raising concern in respect of the consultative draft Policy H8.

Comment No: 13

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

Questions the omission of Areas of Great Landscape Value from the Draft Plan.

Response:

Local landscape designations are under review. "Area of Great Landscape Value" designation may become obsolete during life of Plan. Local Plan reviews will consider landscape policy. The sustainability of any new designations in the Fife context would be evaluated on a Fife wide basis and appropriate areas designated accordingly.

Action:

No Change

Comment No: 14

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The policy on settlement development strategy and coalescence in the existing Structure Plan is clear and should be retained.

Response:

Policy SS1 protects settlements from coalescence with adjacent settlements. Area Local Plans contain policies in respect of coalescence.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

Policies on sport and recreation and golf courses should be included in the Structure Plan. Plan ignores calls for healthy lifestyles and the pressures for golf development in the East Neuk and St Andrews areas.

Response:

This would result in unnecessary duplication. Policies on sport, recreation and golf courses are Core Local Plan Policies, contained in Area Local Plans. The Structure Plan focuses on key strategic issues.

Action:

No Change

Comment No: 16

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Draft Plan Policy H5 sets unsustainable targets of 45% and 40% affordable housing for St Andrews and Cupar respectively. This is not consistent with Scottish Executive guidelines, which set a target of 25%, which should be at least sought and achieved.

Response:

PAN 74 was published after the Consultative Draft Structure Plan was approved. It has been taken into account, along with the updated Housing Needs and Affordability Study in the Finalised Structure Plan and Supplementary Guidance. Revised percentage targets are now consistent with PAN 74.

Action:

Change percentage requirement in Finalised Plan Policy H4 (was H5).

Comment No: 17

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Agree that we need affordable housing, but has got to be retained as such.

Response:

Concerns noted. The policy approach taken is well thought out and has been developed taking account of good practice within the UK.

Action:

Robertson, Alastair - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Support the primary aims of the Plan for the regeneration of Mid Fife and the supply of affordable housing. However, there are concerns that the Plan is aspirational and does not have much in the way of specifics.

Response:

Support noted. The Finalised Structure Plan sets the strategic framework for implementation via the Area Local Plans.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The admission that the document is developer-driven is highly undesirable as the interest of the developer is profit for shareholders and this gives great concern to think of the developers in the driving seat. Consider that developers must be controlled and based on past performance, have grave doubts that this is possible. Also concerned that due to the aspirational, tending towards the non-specific, nature of the plan, the developers will cherry-pick the most lucrative projects avoiding the less lucrative and perhaps more critical ones. Fear is that there is a serious danger that the plan will be a licence for the developers to build private housing in their own interest without taking account the interests of the community. The final Plan should be specific in terms of development sequence and priorities to ensure that the primary aims are achieved.

Response:

The document is "development" driven - not "developer" driven.

Action:

Black, Patricia - Dairsie, Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

The document is too lengthy and is lacking in comprehensive detail to continue the process at this time.

Response:

The document is within the size parameters suggested in Scottish Executive guidance. The main background paper - the Report of Survey sets out the technical information informing the Structure Plan.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Insufficient evidence to determine whether the draft Structure Plan is developer or Council-led.

Response:

The Finalised Structure Plan is clearly Council-led. Any development proposals submitted for consideration are fully assessed against the provisions of the Draft Structure Plan (and Local Plan).

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The proposed developments only benefit developers and the Council.

Response:

Disagree. It is the intention that the Finalised Structure Plan will benefit a whole range of parties.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Fife Council cannot guarantee a 45% rate of affordable housing in any private development.

Response:

The percentage requirement for the St Andrews housing market area have been reviewed in the light of PAN 74, the public consultation and the updated Housing Needs and Affordability Study.

Action:

Revise percentage requirement in Finalised Plan Policy H4 (Draft Plan H5).

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Insufficient detail on how Fife Council will guarantee that affordable housing will be available for local people and local workers.

Response:

This is not a land use planning issue. However, the Implementation Guide sets out the priority client groups. Preference is given to local people but not exclusively so; some provision must be made for incoming workers for example.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Insufficient detail on how much Fife Council will receive in monetary terms from developers and how this money will be spent on public services.

Response:

The Finalised Structure Plan sets strategic Policy approach. Details for the proposals for Developer Contribution is set out in the Finalised Structure Plan at Chapter 3 with information in the Action Plan which is to be reviewed every two years. Detailed discussions will follow once the process has been advanced via Area Local Plans, Master Plans and development briefs. Any financial contributions would be for specified project or purposes.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Insufficient details on why Fife Council has changed its policy on building on greenfield sites.

Response:

Fife Council has not changed its Policy on building on greenfield sites. The main thrust of the Finalised Structure Plan is to use brownfield land. However, in certain areas the planned growth cannot be met from this type of site. The Finalised Plan seeks to identify the greenfield land requirement early in the process and ensure that it is developed in a planned manner to maximise the potential benefits.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Insufficient detail on why Fife Council is proposing to build so many dwellings on greenfield sites when the population of Scotland is falling.

Response:

The strategy as set out in the Finalised Structure Plan clearly explains why Fife is seeking to develop additional housing. Fife Council has not changed its Policy on building on greenfield sites. The main thrust of the Finalised Structure Plan is to use brownfield land. However, in certain areas the planned growth cannot be met from this type of site. The Finalised Structure Plan seeks to identify the greenfield land requirement early in the process and ensure that it is developed in planned manner to maximise the potential benefits.

Action:

No Change

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Insufficient detail as to why Fife Council has moved away from the recommendations of the St Andrews Strategic Study, 1998.

Response:

The 1998 Study was to inform the replacement, Approved in 2002, for the 1994 Structure Plan. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

There is a lack of evidence regarding the assumed economic growth in Fife and a failure to identify long-term employment opportunities.

Response:

Fife Council via the Finalised Structure Plan and other documents is seeking to drive and change the economy rather than wait for employment opportunities to happen. Detailed supporting evidence on employment land issues is contained in the Report of Survey. The Fife Economic Development Strategy complements the Structure Plan and identifies more specifically how the Council and its partners will assist in growing the economy.

Action:

No Change

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Infrastructure

Comment:

A lack of information about the requirements for strategic infrastructure to be provided to support development.

Response:

Information on strategic infrastructure requirements is set out in the Structure Plan Action Plan.

Action:

No Change

Comment No: 12

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

There is a lack of information about the public transport requirements for the future and insufficient evidence that Fife Council has correctly explored other opportunities for transport i.e. trains/park and ride/cycle lanes etc. There is also insufficient evidence to suggest road safety issues have been fully addressed.

Response:

The Local Transport Strategy and Area Transport Plans address Fife's transport priorities and future developments, including safety issues. Finalised Plan Policies T1 and T2 cover a range of travel modes, as do the transport proposals listed in Finalised Plan Proposal PT1.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

There is insufficient detail or evidence of Fife Council having undertaken Environmental Assessment of the Plan and whether it meets with the European Legislation requirements.

Response:

A Sustainability Appraisal was undertaken on the Draft and Finalised Plan, the latter meeting the statutory requirements. The Finalised Plan has been the subject of an SEA and this, together with a supporting document will be submitted to the Scottish Ministers and be available for public inspection.

Action:

No Change

Comment No: 14

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Affordable housing should always remain as such, which would stop the continued waste of good land for developments.

Response:

There is need to provide for a range of new houses, not just affordable houses to provide choice within the housing market.

Action:

Black, A B - Dairsie, Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

The document is too lengthy and is lacking in comprehensive detail to continue the process at this time.

Response:

The document is within the size parameters suggested in Scottish Office Guidance. The main background paper - the Report of Survey - sets out the technical information informing the Structure Plan written statement.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Insufficient evidence to determine whether the draft structure plan is developer or Council-led.

Response:

The Finalised Structure Plan is Council-led. Any development proposals submitted for consideration through the draft Structure Plan (and Local Plan) are fully assessed.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The proposed developments only benefit developers and the Council.

Response:

Disagree. It is the intention that the Finalised Structure Plan will benefit a whole range of parties.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Fife Council cannot guarantee a 45% rate of affordable housing in any private development.

Response:

The percentage requirement for the St Andrews housing market area has been reviewed in the light of PAN 74, the public consultation and the updated Housing Needs and Affordability Study.

Action:

Revise percentage requirements in Finalised Plan H4 (Draft Plan H5).

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Insufficient detail on how Fife Council will guarantee that affordable housing will be available for local people and local workers.

Response:

This is not a land use planning issue. However, the Implementation Guide sets out the priority client groups. Preference is given to local people but not exclusively so; for example, some provision must be made for incoming workers.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Insufficient detail on how much Fife Council will receive in monetary terms from developers and how this money will be spent on public services.

Response:

The Finalised Structure Plan sets strategic Policy approach. Details for the proposals for Developer Contribution is set out in the Finalised Structure Plan at Chapter 3 with information in the Action Plan which is to be reviewed every two years. Detailed discussions will follow once the process has been advanced via Area Local Plans, Master Plans and development briefs. Any financial contributions would be for specified projects or purposes.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Insufficient details on why Fife Council has changed its policy on building on greenfield sites.

Response:

Fife Council has not changed its policy on building on greenfield sites. The main thrust of the Finalised Structure Plan is to use brownfield land, however, in certain areas the planned growth cannot be met from this type of site. The Finalised Structure Plan seeks to identify the greenfield land requirement early in the process and ensure that it is developed in planned manner to maximise the potential benefits.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Insufficient detail on why Fife Council is proposing to build so many dwellings on greenfield sites when the population of Scotland is falling.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Insufficient detail as to why Fife Council has moved away from the recommendations of the St Andrews Strategic Study, 1998.

Response:

The 1998 Study was to inform the replacement, Approved in 2002, for the 1994 Structure Plan. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

There is a lack of evidence regarding the assumed economic growth in Fife and a failure to identify long-term employment opportunities.

Response:

Fife Council via the Fife Structure Plan and other documents is seeking to drive and change the economy rather than wait for employment opportunities to happen. Detailed supporting evidence on employment land issues is contained in the Report of Survey. The Fife Economic Development Strategy complements the Structure Plan and identifies more specifically how the Council and its partners will assist in growing Fife's economy.

Action:

No Change

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Infrastructure

Comment:

A lack of information about the requirements for strategic infrastructure to be provided to support development.

Response:

Information on strategic infrastructure requirements are set out in the Structure Plan Action Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

A lack of information about the public transport requirements for the future and insufficient evidence that Fife Council has correctly explored other opportunities for transport i.e. trains/park and ride/cycle lanes etc. There is also insufficient evidence to suggest road safety issues have been fully addressed.

Response:

The Local Transport Strategy and Area Transport Plans address Fife's transport priorities and future developments, including safety issues. Finalised Plan Policies T1 and T2 cover a range of travel modes, as do the transport proposals listed in Finalised Plan Proposal PT1.

Action:

No Change

Comment No: 13

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

Insufficient detail or evidence of Fife Council having undertaken environmental assessment of the Plan and whether it meets with the European Legislation requirements

Response:

A Sustainability Appraisal was undertaken on the Draft Plan, and will be undertaken on the Finalised Plan, the latter meeting the statutory requirements. The Finalised Plan has been the subject of an SEA and this, together with a supporting document will be submitted to the Scottish Ministers and be available for public inspection.

Action:

No Change

Comment No: 14

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Infrastructure

Comment:

Insufficient details that sewerage facilities can cope with extra housing.

Response:

Fife Council has worked closely with Scottish Water throughout the preparation of this Plan. The most detailed information available has informed the Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Affordable housing should always remain as such, which would stop the continued waste of good land for developments.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the Council will use legal mechanisms and/or Section 75 agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

Pay, Gordon - Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Map 10 in the National Planning Framework does not lend much credence to the proposed increase in Fife's population and in the absence of some other radical changes a change potentially at the expense of other areas of Scotland. The decline in Scotland's population is caused by the current falling birth-rate: There is a valid argument that declining population in developing countries, such as Scotland, is a good thing. However, if lifestyles can be made more sustainable and we do wish to stabilise or slightly increase our population, then the correct support infrastructure has to be put into place.

Response:

Map 10 is based on projected future situation and does not take into account of aims of the Finalised Structure Plan strategy, which seeks to take a pro-active role in growing the population and economy of Fife. Further work on demographic change in Fife over the Structure Plan period has been reflected in the Report of Survey. This reinforces the justification for the policy assumptions on population growth and provides further information to support the strategy.

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Witham, Miles - Wormit, Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Many of the problems the Structure Plan will cause stem from the aspiration to increase the population of Fife from its current level to 370,000 and above by 2026. Note that the projected natural figures are 358,000, thus a large proportion of the new houses proposed are to house an influx of people that the Council itself is promoting. Given Scotland's falling population, it is strongly suggested that the aspiration to increase the population of Fife be scrapped and the house building programme scaled back. This would have beneficial effects on the environment and would improve quality of life for rural residents - 2 of the other major drivers in the structure plan. It is rather simplistic to think that encouraging a large influx of population into Fife is the answer to urban regeneration and the problems with service provision. This is a short-term solution, as once this wave of new people grows older still more people will be required to provide services for them. Continual increasing population with commensurate increased stain on the environment is not supported. Fife Council should be able to come up with more creative solutions to urban regeneration and industry promotion.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Strachan, Paul - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

Whilst registering objection to the Structure Plan, Fife Council is complimented on the quality of the information made available to the public, which is of a high standard, although somewhat inaccessible. However, presentation has taken precedence over content and the vast range of plans serve mainly to confuse and mask the weak planning strategy.

Response:

Objection and compliment noted. Disagree that presentation has taken precedence over content. Supporting documents provided to assist understanding of Plan.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

There are a considerable number of inconsistencies and very little justification for the detail offered. Concerned that many questions were not answered in full at the recent public consultation meetings and there is a distinct inability or unwillingness to answer questions posed on local issues. Staff either came unprepared or had no intention of answering certain questions.

Response:

The document published set out the proposals and justifications at a reasonable level of detail. Experience has shown that it is not always possible to provide comprehensive answers to very detailed questions at public meetings. This does not imply an unwillingness to answer questions.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Inward migration forms to a large extent the basis of the expected rise in population in Fife, but this approach is questioned. Understands that the population of Scotland is in decline. If true, Fife Council should produce the evidence which shows that this decline is a trend that residents of Fife should be concerned about. If the figures which form the basis of Fife Council plans do have some merit, inward migration will not resolve the root cause of population decline, but will cause enormous problems for the infrastructure of towns and villages. Employment, health, education and transportation, etc. cannot sustain such a rapid and unnatural population growth.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

There is no evidence of a growth in employment in Fife and recent announcements have related to job losses throughout Fife. In addition, a number of properties for employment are lying empty and it appears that the only people who benefit from these new factories are other developers.

Response:

The statement that there is no evidence of growth in jobs is not correct. Fife Council via the Finalised Structure Plan and other documents is seeking to drive and change the economy rather than wait for it to happen. The Fife Economic Development Strategy complements the Structure Plan and identifies more specifically how the Council and its partners will assist in growing Fife's economy

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

Concerned that the draft Structure Plan relies heavily on growing the service sector and tourism in Fife. The construction sector will be set to thrive however. Consider this strategy is an incompetent and naive view of how the Kingdom of Fife should grow over the next 20 years, as it will not provide the balanced economy that Fife needs to sustain a thriving service sector and tourism. The vast number of houses proposed in East Fife and the lack of skilled jobs available locally contradict the proposed transportation strategy and will cause more people to travel in private vehicles. Altogether these plans are set to destroy the charming character of Fife's villages.

Response:

Concerns noted. Fife Council is seeking to attract diverse new employment into the area via a number of inter-related measures which will contribute to reducing the need to commute. In addition, the transport strategy is seeking to encourage a shift from cars to public transport. The Finalised Structure Plan makes a commitment to quality development and is intended to contribute positively to, not destroy, settlements. In any event, the housing land allocations in East Fife are much lower than those in Mid and West Fife.

Action:

Saunders, C - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Fife Council should work with Dundee to support housing development in Dundee rather than in North East Fife.

Response:

The housing requirements have been identified to address Fife's needs. The concerns that residential development in this area could be viewed as detracting from Dundee and detracting from the city's ability to bring about regeneration are noted. Strategic housing allocations were given further consideration in finalising the Plan and revised figures are contained in Finalised Plan Proposal H2.

Action:

Association of Business in Cupar and District, Hair, James - Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The single most significant cause of recent house price inflation has been the inadequate supply of land. The Council's historic record of prediction of demand has therefore shown to be inadequate. The proposed allocations are still inadequate, representing an even slower rate of development than in the past 10 years. Major increase in supply has the potential to make a significant contribution to solving the affordable housing crisis and create wealth. This process must start with an increase in the quantity of land for identified for development in Cupar.

Response:

Cupar is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,450 new houses are proposed at Cupar over the next 20 years, with 1,200 being on greenfield land to the north of the town to facilitate a relief road. This allocation of 1,450 new houses is an increase from the consultative draft Plan, which identified 600–1,000 houses over the same period. This change has been made in response to the comments received on the consultative draft Structure Plan together with the need to provide a relief road and affordable housing in the town.

Action:

Housing allocation increased from 600–1,000 to 1,450 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Rural Economy

Comment:

Support for rural development initiatives (Policy E3) but concern that the policy has historically been interpreted in a very restrictive manner resulting in brownfield sites being rejected for development or being restricted to levels which have resulted in residential and commercial development opportunities being missed. Assurances are sought that the policy, as it affects North East Fife, will in future be interpreted in a more progressive and positive manner consistent with other rural areas in Scotland. The statement in para 4.31 contradicts other stated aims as noted above in paras 3.17 and 3.32.

Response:

General support noted. Draft Plan Policy E3 will be incorporated into Local Plans and has been deleted from the Finalised Structure Plan to avoid unnecessary duplication.

Action:

Draft Plan Policy E3 will be incorporated into Local Plans.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

With regard to Draft Plan Policy E4, the hotel and leisure development industry is particularly important to the economy of North East Fife. Why these developments have to demonstrate and identify demand when other activities do not is not clearly justified. There should be a presumption in favour of businesses which demonstrate willingness to invest capital in new projects.

Response:

Concern noted. The Draft Plan Policy E4 will be incorporated into Local Plans and has been deleted from the Finalised Structure Plan.

Action:

Draft Plan Policy E4 moved to Area Local Plans.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Cupar's traditional retail centre has declined over the past 15 years and currently struggles with a number of small businesses barely viable and a significant number of charity shops. The revitalisation of the town centre cannot be achieved without an increase in Cupar's population, significantly beyond the level currently projected. The Structure Plan should positively support such a policy when the residential demand demonstrably exists.

Response:

Cupar is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,450 new houses are proposed at Cupar over the next 20 years, with 1,200 being on greenfield land to the north of the town to facilitate a relief road. This allocation of 1,450 new houses is an increase from the consultative draft Plan, which identified 600 - 1,000 houses over the same period. This change has been made in response to the comments received on the consultative draft Structure Plan together with the need to provide a relief road and affordable housing in the town.

Action:

Housing allocation increased from 600–1,000 to 1,450 in the Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

Assurances are sought that major new development opportunities arising from existing businesses located in North East Fife will not be redirected into Mid-Fife.

Response:

There is no intention to divert growing businesses from East Fife to Mid Fife. However, it is possible that opportunities for employment in Mid Fife could be generated by research and development work undertaken in North East Fife.

Action:

Bowman, Eric - Strathkinness, St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Consider that aspects of the plan are excellent, in particular the recognition of St Andrews University as an important component of Fife's economy in the future; the commitment to increasing affordable housing; and the proposals to link pedestrian and cycle networks.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

Concerns about the Plan which generally relate to the document itself and the proposed policies. There is surprise that the effectiveness of the last Structure Plan was not explored (and in particular any departures from it). Also, it is not clear as to whether the Structure Plan will be legally binding on the Council and planning authorities.

Response:

Concerns noted. The effectiveness of the approved Structure Plan is reflected in the number of policies taken forward into the Finalised Structure Plan. Plan must be used as material consideration in determining planning applications and as a framework for Local Plan preparations.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Concerns about the scale of development proposed for East Fife and lack of distinction between large and medium scale allocations as shown in Draft Plan Schedules H2 and H3. There is a lack of justification for the HLR, which does not reflect local opinion, which supports affordable housing rather than large or medium-scale development as proposed.

Response:

Concerns noted. The justification for the Housing Land Requirement is described in the Report of Survey, which details how it is calculated. Proposal H2 of the Finalised Structure Plan replaces Schedules H2 and H3 and its supporting text describes the distinction between Strategic Development Area and Strategic Land Allocation. Policy H4 of the Finalised Structure Plan clearly sets out how affordable housing will be delivered over the Plan period. The St Andrews and East Area Local Plan will identify specific sites to meet the housing land requirement for the area.

Action:

Clarification of distinction between Strategic Development Areas and Strategic Land Allocations.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Justifying further development in St Andrews on the basis of the University and on golf tourism is misguided at best and at worst misleading. The University does not plan any major expansion of undergraduate numbers and turning St Andrews into a sprawling retirement suburb is likely to harm tourism. Finally, the local secondary schools, health centre and hospital are already overstretched - development on the scale envisaged will make matters worse. It is not clear why Fife Council is proposing to develop the St Andrews, Cupar and Guardbridge/Leuchars area so heavily when it admits that the population of Central Fife is contracting.

Response:

It is considered that St Andrews has the potential to play an important role in generating significant employment opportunities.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

In view of the recent Clean Neighbourhoods and Environment Act passed by the UK Parliament and its recognition of light pollution as a statutory nuisance, it is considered that this matter caused mainly by badly designed road lighting should be addressed.

Response:

This is not a land use planning issue.

Action:

Evans, Alan - Newburgh, Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Whilst the northern part of Fife remains very beautiful and the planners in Fife Council must be attributed with much of the credit for this, it is interaction between the countryside and the built environment that gives this part of Fife so much character. Development as proposed in The Structure Plan would be a disaster, and there is no need for enormous developer-led housing estates blighting towns and villages in this area. There is considered to be no need to allocate land for light industry, business parks or park and ride schemes. The aspirations expressed by Fife Council officers for the area are not shared by the local population. North and East Fife have a unique semi-rural character that must be protected as this is precisely what attracts people to the area.

Response:

The scale of development proposed is to be over among period 2006-2026. The land allocation will be controlled by detailed masterplans and via Local Plans, and development briefs to ensure that Fife's sense of place will not be destroyed.

Action:

Stevenson, Fionn - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

There is no justification for the decision to increase Fife's population by 5% over 20 years primarily through an "over-allocation of housing requirements" (para 1.12). This relies on drawing commuters across the Forth and Tay bridges because there is no real plan for the region to develop economically beyond a notional increase in higher education spin-offs and commercialisation. The identified employment opportunities are unlikely to provide for 20,000 extra people. The plan to use an "over-allocation of housing requirement" to drive the regional economy is not justified or sustainable.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Creating "increased connectivity" (para 1.17) is fundamentally at odds with the Sustainability Appraisal, given that any aim to increase the amount of travelling in the area will have negative environmental impacts, because travel to work in Fife is 65% by car and increasing. Fife Council has little control over public transport investment and is unlikely to improve public transport.

Response:

Disagree. In some instances improving connectivity will reduce the actual amount of travel. In addition it is intended to improve public transport links and reduce reliance on cars.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The excessive proposals for housing development in Fife contradict the requirement to safeguard the rich and varied natural environments (para 1.28) in numerous areas where greenfield sites will be built on. Settlement identities, which are also required to be protected by the Plan, are threatened by the sheer volume of new housing proposed. The character of Fife's villages is threatened when there are proposals to increase the population sizes by up to 25% in some cases.

Response:

The development of the necessary greenfield sites will be planned to ensure that they take full account of the natural and built environment. Development will be planned to ensure settlement identities are not destroyed. Planned change is to take place over a 20-year period.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Policy SS1 outlines 6,400 houses for the St Andrews and East Fife area, with up 950 identified for the Tay Bridgehead area. The previous Local Plan only identified 184 new houses being required. Asks how this is justified and whether developers are driving planning policy again?

Response:

The scale of development proposed is over the period 2006-2026. The allocations have been revised and are now shown in Finalised Plan Proposal H2. The land allocation will be controlled by detailed masterplans and via Local Plans, and development briefs to ensure that Fife's sense of place will not be destroyed.

Action:

Housing allocation in Tay Bridgehead (Newport, Tayport and Wormit) reduced from 750-950 to 500.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Draft Plan Policy H3 states that sites will be preferred which are close to employment opportunities and have good transport links. In the Tay Bridgehead area, the main employment opportunities are in Dundee and St Andrews, both of which have relatively poor public transport links to the area. Equally the road between the Tay Bridge and Tayport is poor and more traffic on this road will only make matters worse. It is not clear what co-operation there is between Dundee City Council and Fife Council on Policy SS1. Why not more new housing provided in Dundee rather than in the Tay Bridgehead area?

Response:

Noted. The Structure Plan must provide for a range of housing development across Fife to promote economic growth and ensure an appropriate mix and distribution of new housing. The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan. Draft Plan Policy H3 now Finalised Plan H2.

Action:

Housing allocations reduced from 750-950 to 500 in the Finalised Plan.

McGavin, K S - Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Policy should ensure that commuter traffic from North East Fife does not increase. Every effort must be made to ensure Dundee rebuilds its brownfield sites and does not overspill into Fife's greenfields. More work should be undertaken between Dundee and Fife authorities. Enlightened policies by Fife Council would benefit Scotland be it at the Forth or Tay.

Response:

Objection noted. Concerns about possible growth of commuter traffic noted but the Finalised Structure Plan is seeking to ensure that the Plan meets the needs generated in Fife. The Finalised Structure Plan also supports improved public transport service to reduce reliance on car travel. Disagree that presentation has taken precedence over content. Supporting documents provided to assist understanding of Plan.

Action:

Review consultative process.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Concern that the public meeting in Cupar degenerated into a slagging match. In future there should be no more public meetings of 300 people. Future consultations should make use of groups such as Rotary, Round Table, churches, youth groups, etc. A recent stakeholder meeting recently at Elmwood College was ideal.

Response:

Concerns noted. Whilst it is agreed that stakeholder meetings have a role to play in the consultation process, it is considered that this approach alone could be viewed as excluding members of the public not affiliated to any organisation.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

"Affordable housing" means different things to too many politically prejudiced causes. It has been shown that to meddle with natural market forces has rarely worked. Local authority officials must use the local press and very simple words to explain why a one-size fits all approach does not work. Concern that Cupar could become the dumping ground for those a) not fit for St Andrews, and b) those thrown out of Central and West areas.

Response:

The definition of affordable housing used in the Consultative Draft Structure Plan and Supplementary Guidance on Affordable Housing is consistent with that contained in SPP3 and PAN 74. It is quite legitimate for the planning system (and hence developers) to make a contribution to meeting the needs for affordable housing and this is set out in SPP3. The aim of the Structure Plan approach is to meet need as close as possible to where it arises and, wherever possible, within the same housing market area.

Action:

Downie, Thomas - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Straightforward questions at the St Andrews public meeting were not answered.

Response:

Most of the questions posed were answered. Not everyone was satisfied with the answers given.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Future development should take place in areas which have a railway station to help to reduce commuter traffic.

Response:

The major growth areas are all close to railway stations. It is not possible to locate all new development on the rail network.

Action:

Mordi, Loretta - Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Welcomes strategy and Action Plan for Cupar and Fife.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Concerns and reservations about the number of proposed housing developments. Some of the numbers seem to be unrealistic in some areas in terms of sustainability, such as the Tay Bridgehead area and Cupar.

Response:

Concerns noted. The identification of strategic development sites has resulted from thorough research into the most suitable and sustainable locations. The proposed development outlined in Finalised Plan Policy H1 and Proposal H2 have also been influenced by comments received to the draft Plan, and reflect housing need and demographic change as detailed in the Report of Survey.

Action:

Revised allocations.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Proposal for affordable housing is laudable, however no mention is made of social housing for renting, the type of housing that could attract young people and the unemployed.

Response:

Support in principle noted. The Council's priority is for social rented housing and this is made clear in the text of both the Finalised Structure Plan and Supplementary Guidance. The Implementation Guide on Affordable Housing states that the preference will be 65% social rented housing to 35% other tenures.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Infrastructure

Comment:

Mention is made of encouraging planning for employment, education and hospitals, but there are no written commitments or undertakings of the other partners, other than developers, in the documents. Neither were there opportunities to speak to service providers during the public consultation.

Response:

Fife Council has been in dialogue with all of the service providers in preparing the Draft and Finalised Plans. Information on infrastructure and service needs/provision are set out in the Structure Plan Action Plan. It is intended that developer contributions will secure essential infrastructure. See section in Developer Contributions in Finalised Plan Chapter 3.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

The timing for feedback has been very short, for what is supposed to be an important means of decision-making that affects the life of present and future generations of the people of Cupar and the whole of Fife. Fife Council is urged to re-consider the consultation process and allow more time for officials to engage with the public by holding further meetings. This would enable information to be presented in an understandable way at neighbourhood or local level so that those most directly involved can gain a better understanding of the proposals.

Response:

The documents which were the subject of the consultation were in the public domain from late November 2004. The public consultation period was in excess of the statutory period and this was further extended to take account of comments submitted well beyond the closing date. The consultation process is under review to improve consultation in the future. Suggestions on the process are welcomed and will be fully considered.

Action:

Review consultation process.

Mathieson, David - Newburgh, Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

The public is entitled to quantitative answers and specific assurances from the Local Authority. The Development Plan is vague on major issues, lacks financial data, and social needs identified to support such an apparently costly, ambitious and risky enterprise. There has been an unreasonable amount of time afforded for the public to study the Plan, let alone present questions or document comment/concerns. Concern that the tone of public meetings suggests that the outcome has been pre-determined. Assurances are required from Fife Council that the public perceptions on this exercise are unfounded.

Response:

The Structure Plan is the strategic planning document and the Action Plan the supporting document which provides details of the supporting works and funding mechanisms. Until the proposals are progressed via Local Plans and Master Plans, it is impossible to provide detailed costing. The documents were in the public domain from late November 2004. The public consultation period was in excess of statutory requirements and was further extended.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

The lack of involvement from Fife's elected representatives was obvious during the process, perhaps associated with the timing of the national/local elections? Suggest that the local authority and elected representatives should be expected, as a minimum, to define the realistic benefits which individual communities and their residents can expect.

Resnonses

The Elected Members have been involved in the process of producing the Development Plan. Defining the detailed elements of the Plan is the role for the Area Local Plan, Master Plans and development briefs.

Action:

Royal Air Force Leuchars Perry, K W - Leuchars, St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Confirm that there are no current or future plans to commercially develop land at RAF Leuchars. If any such development is identified, Scottish Enterprise Fife and Fife Council would be informed. Confirm that RAF Leuchars does provide a very limited commercial air facility to privately-owned aircraft. At present RAF Leuchars has no capacity to facilitate any increase in usage.

Response:

Opportunities to facilitate economic development at Leuchars will be kept under review.

Action:

Kuehn, R - Blairhall, Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Consideration should be given to the opening of the railway line from Kincardine to Dunfermline, which would make the public transport service competitive and may assist in reducing fares and encouraging greater use of public transport.

Response:

This is identified in Proposal PT1 of the Finalised Structure Plan..

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

The document on housing in Blairhall did not give much information. Only the transport section of the Plan was explicitly covered at the Kelty meeting.

Response:

The issue of the future development in Blairhall will be addressed via the Area Local Plan which will be the subject of a separate public consultation exercise. There was the opportunity at the meeting to raise questions about Blairhall.

Action:

Leatherland, Beryl - Limekilns, Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

It is essential to co-operate with the Lothians and to devise an airport link to Fife. There should be more water transport, both local ferries and for freight. Within Fife the management of traffic must be addressed more effectively. It is essential to have a Dunfermline by-pass; this is not mentioned in the document. Park and ride both must be made more extensive, using more northerly locations than Inverkeithing and more parking spaces should be provided. The document has some good proposals and it is hoped they will be implemented. Much worker time is wasted in slow commuting, links between Fife and the Lothians must be improved. There must be more cycle routes between areas of work and residential zones.

Response:

Transport initiatives Edinburgh (TIE) has been commissioned by the Scottish Executive to develop a rail scheme to provide direct access to Edinburgh Airport from the rail network. This new rail link will also improve rail access from Fife to Glasgow and the West of Scotland. The Plan supports the provision of a Rosyth Bypass, which would reduce traffic West-East through Dunfermline, together with additional park and ride facilities (Finalised Plan Proposal PT1). Further projects will be detailed in Area Local Plans, Masterplans and development briefs.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The integrity of the West Fife and other coastal villages should be maintained as they add much to the character of Fife. The idea of mixed communities is idealistic and cannot be imposed; communities have to have a commitment and willingness to engage. The Structure Plan must recognise that "vibrant thriving communities with a high quality of life" depend on cultural attributes sadly lacking in a large proportion of Fife. A 20-year Plan may be long enough to make some initial impact if this was explicitly addressed. Developments like Dunfermline Eastern Expansion should be avoided.

Response:

Comments noted.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

The standards of energy efficiency in premises built in the Dunfermline Eastern Expansion area are deplorable, and only marginally better than in properties of 30 years ago.

Response:

New buildings must comply with currently applicable building standards. However, there is scope for the planning system to increase energy efficiency by promoting masterplans and development briefs which utilise solar passive design.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

The Hyundai/Motorola/Freescale site should be prioritised for development. Nothing has been done for several years to ensure this expensive facility in a prime location with its associated infrastructure is used. If this site does not appeal to industries, it is unlikely that other major industries will locate in Fife.

Response:

The site is still available for development, though at this time the company has not delivered it and its use is promoted by various agencies. The future of an individual purpose built facility is not representative of the general situation.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

Fife has a problem retaining young, educated, skilled people. It is erroneous to consider that there is a well-educated workforce in Fife in general. There is considerable unemployment and lack of drive which is a cultural attitude to work which should be addressed by a range of strategies.

Response:

This is an unduly pessimistic overview of Fife residents. Although there is a degree of deficiency within the Fife workforce, it is not necessarily attributable to low levels of take up of education by Fife's students. There is a higher than average take up of both higher and further education amongst Fife school leavers.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Tourism

Comment:

Tourism could be a much stronger feature of the Fife economy but various factors mitigate against this. Cultural change to overcome these problems requires to go hand in hand with Structure Plans and other documents as they cannot be considered in isolation.

Response:

Fife Council is working in partnership with various agencies to increase the positive benefits of tourism and it is agreed that the Development Plan has a positive role to play. There are numerous references to tourism in the Finalised Structure Plan and additional wording has now been inserted into Policy E1.

Action:

Amend Policy E1. *Comment No:* 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Coast

Comment:

There needs to be some protection of coastal zones from erosion where this is feasible and be cost-effective. There is evidence of neglect in Fife in this area which may need greater expenditure in future years.

Response:

Fife Council Coastal Management Plan assesses and addresses the issue of coastal erosion for the whole of the Fife coast and provides the framework for coastal protection works.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

There should be a principle of reluctance to build on greenfield sites. Maps showing the brownfield sites that could be used for development in local areas would have been a useful inclusion. The proposals to emphasise the suitability of derelict and vacant sites for regeneration must be highlighted to communities.

Response:

Finalised Plan makes it clear that the main thrust is toward the use of brownfield sites. The identification of brownfield sites is a role for Local Plans.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

There is concern about the reference to relatively cheap land in para 1.6. For area development purposes, land should not be valued merely in monetary terms, as all land is a valuable resource and its sustainable use must be given due attention.

Response:

The phrase is used to illustrate the point made in this particular paragraph. Finalised Plan clearly recognises the need to ensure that all development should be sustainable and that the release of land for development is properly planned.

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

This section gives a token nod to current issues and targets, and is not sufficiently detailed with specific proposals. Wind farm developments in Fife should be encouraged as should the development of other suitable technologies. There is no mention of small-scale community developments and this should be added to Draft Plan Policy R1. These are less environmentally intrusive and are very viable in terms of energy production.

Response:

The Policy objective is to encourage renewable energy technology development, but proposals must be in accord with all Development Plan policies. The Plan does not discourage small-scale community developments, but is well aware of their potential, and each proposal would be considered on its merits.

Action:

Draft Plan Policy R1 is now included in Area Local Plans.

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

Energy efficiency in housing is mentioned but it is not highlighted in the section that is dealing with home building.

Response:

Noted. However, the planning system has no power to enforce higher building standards, but it can influence site layout to ensure maximum benefits from passive solar energy.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

Would be useful if information on the long term future of Longannet Power Station were included.

Response:

Longannet Power Station is operated by Scottish Power and there is no definitive information on its projected life.

Action:

No Change

Comment No: 13

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Policy SS1 should take account of the requirements of the Water Framework Directive.

Response:

Premature pending SEPA deciding on the means to implement Directives.

Action:

No Change

Comment No: 14

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

Mention should be made in the plan to Blue Flag Beaches under additional policy included in the environment section of the plan. Agriculture and fishing should also be mentioned as this employs a large number of people who live in Fife, and these activities contribute to the heritage, character of the landscape, features of the coastline and the environment. These rural economies should be supported and there should be more emphasis on local food production.

Response:

Disagree. Blue Flag Beaches are not a strategic issue. Plan strategy supports the Rural economy. Limited planning controls over agricultural activities means that policies on some issues may be incapable of implementation.

Action:

Hume, Ian - Gowkhall, Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Dunfermline

Comment:

Supports Fife Council's efforts to set out a framework for the future expansion and development of Dunfermline and as a landowner in North Dunfermline, is willing to work with neighbours to contribute to this process.

Response:

Support noted. Stakeholder interest in area also noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

A number of issues relating to Dunfermline Town Centre should be considered, including a definition of a town centre area, various detailed issues with regard to change of use, car parking and the provision of public transport.

Response:

The delineation of Town Centre boundaries and other detailed land use issues will be issues for the Dunfermline and West Fife Local Plan to consider. Parking and public transport issues are dealt with via the Local Transport Strategy and the Area Transport Plan processes.

Action:

Dunfermline City Centre Business Forum, Sullivan, William - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Dunfermline Town Centre should be bounded by streets listed in submission.

Response:

The delineation of Town Centre boundaries will be an issue for the Dunfermline and West Fife Local Plan to consider.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Within defined Town Centre area support/priority should be given to developments for housing or office accommodation.

Response:

Agree. Policy S1 promotes a diversity of uses including housing and commercial activities in the interests of regeneration.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

If the Co-op site in Dunfermline Town Centre is not re-developed for retail/mixed use within five years, it should be allocated for housing/environmental improvements.

Response:

Comments are noted. Fife Council has been actively pursuing action on the Co-op Building over the last few years and secured the Order which progressed the demolition of the building. The Council is pressing the owners to progress the redevelopment of the site.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

There should be a presumption in favour of changes of use from retail to housing/business use outside the existing primary shopping centre.

Response:

These detailed land use issues will be addressed by the Dunfermline and West Fife Local Plan.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Thomson's/Fire Station/Car Parks to north of Carnegie Drive in Dunfermline should not be developed for a large retail store.

Response:

These detailed land use issues will be addressed by the Dunfermline and West Fife Local Plan.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Car parking within new Dunfermline town centre should be free but time limited.

Response:

This is not a strategic planning issue.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Should be a free long stay car park to west of Carnegie Park with pedestrian access to town through the park.

Response:

This is not a strategic planning issue. The Area Transport Plan gives details of transport schemes for Dunfermline.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Public Transport

Comment:

Should be regular and frequent bus services to town centre from Dunfermline Eastern Extension. The time that buses take to travel to Dunfermline from neighbouring towns should be reduced in order to make them more attractive to commuters and shoppers.

Response:

Fife Council is working towards securing improvements to the public transport system via the Local Transport Strategy.

Action:

No Change

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

Development Services should make an effort to process applications for consents relating to town centre within statutory time limits.

Response:

Development Services makes every effort to determine planning applications within statutory timescales. However, some proposals require a longer timescale in order to consider all the material issues.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

Number of licensed premises in proximity to existing houses and the hours they open should be restricted.

Response:

Not a strategic planning issue.

Action:

No Change

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

Town Centre should be better lit at night.

Response:

Not a strategic land use planning issue.

Action:

Reid, Peter - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

A more balanced social mix with varieties of housing tenure types, more local employment and more local provision of services is required to address Fife's problems of deprivation, industrial decline, centralisation of services, etc.

Response:

The detailed issues mentioned will be addressed via the Local Plan, Master Planning and development brief process.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

The Structure Plan aims to increase the population of Fife. Unconvinced that there should be an increasing level of housing provision in the Structure Plan and although it has been argued that Fife is experiencing low levels of housing occupancy and requires more houses, this considered with high house costs are leading to multiple occupancy.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

If the justification for more housing is based on the number of people choosing to live alone, the requirement for housing estates full of houses with multiple bedrooms is questioned; if it is lower occupancy, then the housing supplied should fit this need by providing more one bedroom flats.

Response:

The housing land requirement is calculated by considering a range of factors, including household size. The Development Plan supports development of a range of housing locations and tenures, but market demand will deliver the housing required. The size of individual houses is not a Structure Plan issue.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The requirement for affordable housing is not questioned, but the projected new housing can only include whatever affordable housing can be achieved through the planning system. It is likely that this will result in a number of expensive houses required to provide affordable houses. Some of the cheapest housing in Scotland exists within Fife. By addressing existing problems, the issues could be resolved through regeneration and imaginative planning and social engineering.

Response:

Provision of affordable housing also includes affordable housing built by Housing Associations using Communities Scotland funding. The provision of affordable housing through the planning system is a legitimate means of contributing to meeting the need for affordable housing. This is supported by the Scottish Executive's planning policy. Many other local authorities across Britain are using this approach. New housing should contain a mix of house types to help achieve mixed and balanced communities. It will not be limited to the top end of the housing market. House prices in Fife vary considerably. In Elie, for example, the average house price was £244,000 in 2004 (source: House Sales in Fife 2004, Fife Council). However, affordability is not simply related to house prices. It is also dependent on household income. Housing is a particular issue for those on modest incomes.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The experience of the Dunfermline Eastern Expansion Area should not be repeated, where houses have been built with the promise of amenities to follow, which has not been realised.

Response:

It is intended that infrastructure and service for new planned development will be in place at an appropriate time.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

An increasing number of roads in Dunfermline are becoming unusable through excessively high levels of traffic and links to Edinburgh are strained. The rail service linking Dunfermline with Edinburgh is of a poor standard and there appears to be no scope to increase public transport and no spare capacity at peak times to allow trains to cross the Forth Rail bridge. The proposals listed at para 1.19 to improve the efficiency of cross-Forth transport are impractical, as demonstrated by the FETA consultation, or for new means of transport. There seems little real prospect of additional means of crossing the Forth within the next 20 years, and therefore no additional housing should be built or planned for this area in this Structure Plan.

Response:

Development Services will work in partnership with Transportation Services and other roads agencies to ensure a suitable road network in support of any new development. Fife Council is working towards solving the current cross-Forth congestion problems through a series of initiatives, including the provision of park and ride facilities and railway platform lengthening. Further planned works are set out in Finalised Plan Proposal PT1 and in the revised Fife Local Transport Strategy.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Oppose the planned expansion within the Bridgehead area, including the Dunfermline SDA. This development is unsustainable as there are no local jobs and people will not be able to cross the Forth to work. The Bridgehead area is already extremely built-up, and further development would be unattractive and excessive. The whole Bridgehead area is turning into a vast housing development with all the towns and villages agglomerating.

Response:

It is considered that the planned scale of growth in the Forth Bridgehead area can be achieved without loss of mobility to cross into Edinburgh and the Lothians and without settlement coalescence. Additional strategic employment land is also identified in this area.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The Plan should identify positive measures to deliver local jobs and services to the Bridgehead area, to regenerate communities, and to increase the social mix and diversity in line with established planning principles. Considers that these views reflect those of most local people, as evidenced by discussion at the public meeting in Dunfermline.

Response:

It is considered that the Plan does set out a strategy to address the issues mentioned.

Action:

Stephenson, Chris - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Based on the experience of the Dunfermline Eastern Expansion Area, which appears to have brought no additional benefits to Dunfermline, it is suggested that any large-scale housing development in Fife should be centred on Kirkcaldy and Glenrothes, where there are retail facilities and a commitment to hospital facilities. Concern that Fife Council has been pressurised by central Government to make Dunfermline and West Fife an over-spill area for the preservation of Edinburgh's Green Belt, without due regard to the quality of life and amenities in Dunfermline.

Response:

Concerns noted. The Plan does allocate a significant amount of growth to Mid Fife. It is considered that the planned scale of growth in the Forth Bridgehead area can be achieved without loss of mobility to cross into Edinburgh and the Lothians and without settlement coalescence. There is a need to provide new housing in West Fife as well as Mid and East Fife.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Concern about the lack of consultation on the proposed Dunfermline SDA and the lack of publicity and opportunity for members of the public to make their comments known. Details of the proposals should have been sent to all residents in the affected part of Dunfermline and Crossford, in order that they could provide their observations to Fife Council.

Response:

The proposals for the Dunfermline SDA were in the public domain from November 2004 and many people from Dunfermline took the opportunity to contact Fife Council about their concerns, and received replies before the extensively advertised public consultation period. At the time of preparing the Draft Plan, the proposal was only a strategic allocation and very indicative. The Finalised Plan at Proposal H2 sets out the proposed allocation which will be considered by the Scottish Ministers who will take account of comments submitted to them. Detailed land use allocations will be addressed via the Area Local Plan which will be the subject of a full public consultation exercise.

Action:

McLellan, Andrew - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Dunfermline

Comment:

Concern about proposed development in West Dunfermline, particularly the effect on Forth Bridge traffic the impact of construction vehicles and the destination of a splendid part of Dunfermline. Considers that this part should be set aside.

Response:

The issue traffic congestion has been taken into account and the proposals, taken in conjunction with the Local Transportation Strategy, include solutions to traffic problems.

Action:

Simpson, James - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Objects to the proposed increase in population of Fife to 370,000 in the lifetime of the Structure Plan and the desire to raise the population to 400,000 in a further 20-year period. Considers that these figures would result in damage to the future environment of Fife and that they are totally unrealistic. Scotland's population is predicted to decline significantly over the Plan period, and considers there is no reason why Fife should be any different from the rest of Scotland. No evidence has been submitted by Fife Council to show that there will be sufficient demand to meet the housing land proposals.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Fife Council's housing land proposals are unrealistic for many reasons. It is clear that Fife Council anticipates that many of the migrants to Fife will come from Edinburgh as demonstrated by figures relating to Dunfermline's eastern expansion. However, this assumption is based on the development of a second Forth crossing which, although included in the draft Structure Plan, cannot be delivered by Fife Council. If there is no second Forth crossing in the lifetime of the Structure Plan, the entire housing land proposals for Fife and many of the economic proposals which are dependent on this housing land supply are effectively nullified.

Response:

Disagree. Fife Council has produced a paper looking at demographic change in Fife. This report reinforces the justification for the policy assumptions on population growth and provides further information to support the Strategy. While the Structure Plan strategy is to grow the population of Fife by 5% over the period 2006-2026, the housing land requirement is an assessment of housing need and demand principally generated by new households. This is driven by a reduction in household size brought about by natural change, together with inward migration.

While a number of measures can be taken to increase the capacity of the existing crossings, the Plan flags up the potential of a further Forth multi-modal crossing to ensure that the national economy is not hindered by road congestion. Fife Council believes that a new multi-modal bridge is required to serve eastern Scotland and to assist in growing Scotland's economy.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Within the document, the only justification for an increase in population is the impact which this will have on the local economy and regeneration of communities. At the heart of this justification is a fallacy that, if we increase the population of Fife, this increased population will spend more money within Fife and therefore local communities will flourish and town centres will prosper. There is no evidence to show that this is the case. Indeed, any evidence which we have is to the contrary. Similar arguments were used as a justification for the Eastern Expansion of Dunfermline, which has had no impact on the vitality of Dunfermline town centre and retail leakage has continued to increase. Whereas in the last 30 years there has been a significant decline in the population of the City of Glasgow and the economy and vitality of this city centre has improved dramatically, thus illustrating how flawed Fife's economic assumptions are. The improvement of town centres relates to other factors such as town centre policies and not to crude population increases.

Response:

As stated in response to first comment (0111 01)demographics have been reassessed to inform the Finalised Structure Plan. It is not considered that the example of Glasgow justifies that accepting population decline equates to the likelihood of economic growth. It is agreed that the improvement of town centres relates to a number of factors and the Finalised Structure Plan seeks to set the strategic framework to addressing this.

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Dunfermline

Comment:

There will not be sufficient land in the area to the North and West of Dunfermline to accommodate an expansion if account is taken of the constraints which apply such as the quality of the landscape and the requirement for ground stabilisation due to the former mine workings in the area.

Response:

The landscape issues and ground stability issues will be fully taken into account in the preparation of the Area Local Plan. A study into the mineral stability factors can be viewed on www.fifedirect.org.uk and landscape studies have been undertaken.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

The absence of reference to Areas of Great Landscape Value in the Structure Plan is noted. It is hoped that this is not a deliberate omission and that the policy for these areas will be included in the final version of the Plan.

Response:

Local landscape designations are under review. "Area of Great Landscape Value" designation may become obsolete during life of the Plan. Local Plan reviews will consider landscape policy.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Concern as to the compatibility of the Dunfermline western expansion with the Plan's desire to achieve 30% affordable housing from this area. As developers are being asked to provide new schools, doctors' surgeries, amenity land and roads for this development, the request for 30% affordable housing is unrealistic. The Structure Plan should identify what is important for potential expansion - social amenities or affordable housing, as both could not be achieved.

Response:

The Finalised Structure Plan sets the strategic Policy approach however the target for Dunfermline is being revised. Detailed discussions will follow once the process has been advanced via Area Local Plans, Master Plans and development briefs. In the event that requirements must be prioritised this would be determined when proposals were being considered in detail taking account of all the relevant factors.

With regards affordable housing requirements this is set out in the Finalised Plan as revised.

Action:

Change to affordable housing requirement.

Suttie, W - Steelend, Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Disappointment that there is no plan for the former Comrie Colliery site. It is almost 20 years since the pit closed and there should be some new development by now. The site is ideally situated to benefit from the new Kincardine Bridge and associated road links.

Response:

The Finalised Structure Plan seeks to provide for development in and adjacent to settlements rather than in rural areas. Fife Council agreed that one of the guiding principals was "to guide economic and other benefits of a growing population to existing settlements, there should be no new, free-standing towns or villages in Fife during the Plan period.

Proposals to develop Comrie Colliery for residential use is not consistent with overall strategy which promotes new development as per Policy SS1 and Policy SDA1.

Action:

Kelly, James - By Blairhall, Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The draft Plan is laudable but seems slanted towards developments centred in and around Dunfermline town and its environment. This represents limited thinking and ignores the obvious need to develop outlying areas in tandem with the more populated areas. In particular, stress should be given to the regeneration of the villages and environments of West Fife, with particular emphasis on exploiting the links and opportunities which exist from the Kincardine Bridge and the new Forth crossing.

Response:

The Plan does focus a significant proportion of the new housing requirement in West Fife to Dunfermline. The remainder of the requirement will be allocated through the forthcoming Area Local Plan.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Emphasis should be given to rehabilitating sites such as Comrie colliery, providing as it does an opportunity to regenerate an area of past industrial decline to the benefit of the existing population and businesses. This could be achieved by 1) cleaning up the site, 2) exploiting any available minerals, 3) redesignation for a cohesive mix of retail, industrial, commercial, domestic and community based projects, thereby exploiting the links and allowing access from areas such as Glasgow, Edinburgh, Falkirk and Stirling for the local population. This would also have the added benefit in the dividend associated with inward investment and inward movement of goods, persons and services. West Fife is ideally situated to benefit and Comrie is the ideal place to act as a catalyst for this. Failure to develop this derelict and neglected area of Fife would be a missed opportunity.

Response:

The Finalised Structure Plan promotes the rehabilitation of sites and the options suggested are noted. Strategic housing allocations were given further consideration in finalising the Plan and are set out in Finalised Plan Proposal H2.

Action:

Cousins, Isabella - Oakley, Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Concern that the Comrie pit bing does not feature as a high priority in this Plan. It is time that the area is made safe and redeveloped.

Response:

Fife Council agreed that one of the guiding principals was "to guide economic and other benefits of a growing population to existing settlements, there should be no new, free-standing towns or villages in Fife during the Plan period.

Proposals to develop Comrie Colliery for residential use is not consistent with overall strategy which promotes new development as per Policy SS1 and Policy SDA1. Discussions have taken place with potential developers. Strategic housing allocations have been given further consideration in finalising the Plan.

Action:

Martin, Ross - Larbert

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Cannot understand why so much investment is being poured into Dunfermline to the apparent exclusion of the other communities within the western part of Fife.

Response:

The Finalised Structure Plan identifies the Dunfermline area as one which should be the subject of major development in the future. The Area Local Plan will allocate development of a smaller scale within West Fife.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Considers that there should be discussion on the merits of a new settlement at Comrie Colliery to act as a generator for new jobs for local people. The opportunity of linking a development in West Fife to the Kincardine rail and road network should be evaluated.

Response:

Fife Council agreed that one of the guiding principals was "to guide economic and other benefits of a growing population to existing settlements, there should be no new, free-standing towns or villages in Fife during the Plan period.

Proposals to develop Comrie Colliery for residential use is not consistent with overall strategy which promotes new development as per Policy SS1 and Policy SDA1. Discussions have taken place with potential developers. Strategic housing allocations have been given further consideration in finalising the Plan.

Action:

A number of changes have been made to the strategic housing allocations as detailed in the Finalised Plan at Proposal H2.

Harwood, J - Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

The proposal to grow Fife's population to 370,000 by the year 2026 is ill-conceived and unsustainable. The precise figure is not justified in the Structure Plan and appears to be bold or aspirational. The growth proposed is driven by the view that the population of East and West Fife must be allowed to increase at historical rates if the population decline in Central Fife is to be reversed and that these changes can only be achieved by a massive increase in the housing stock. It is not clear where immigrants will be drawn from, as it is unlikely they will come from Scotland, given Scotland's falling overall population.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Suggests that a sensible and sustainable strategy would be to encourage those people who wish to move to Fife to locate in Central Fife by investing heavily in making it more attractive (for example, by improving rail links to Edinburgh) and by discouraging any further building in East and West Fife. The inevitable consequence of the current strategy is that developers will choose to build in East and West Fife, where they can attain higher profits on their houses, rather than building in Central Fife, where house prices, and profits on house sales, are amongst the lowest in the UK. The proposed strategy is likely to result in continued expansions of the populations of East and West Fife, resulting in increased road traffic and congestion, as residents will have to commute to Dundee and Edinburgh because there are few local jobs. Eventually the quality of life in these parts of Fife will fall to a level that makes it attractive to live in Central Fife, but this is hardly the best way to create an attractive place with thriving and sustainable communities and diverse environments. Rather it will create the same kind of suburban sprawl that typifies so much of Southern England. Consider that these aspects of division are unimaginative and are poorly thought out.

Response:

Whilst the Structure Plan strategy is to attract people to Mid Fife, the Plan cannot ignore the needs of East and West Fife for the Plan period 2006-2026. It is intended that the location of the growth areas in close proximity to the existing public transport network would facilitate community via an improving public transport network. In addition the provision of employment land and other actions are intended to create employment in these areas as a counter attraction to commuting from Fife for employment.

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action

No change in planning for 5% growth.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

There is no shortage of affordable housing in Fife, just a shortage of places where people want to live. The solution is to make the existing affordable housing more attractive, not to decrease the attractiveness of the rest of Fife.

Response:

The updated Housing Needs and Affordability Study has identified a need for approximately 5,000 new affordable houses across Fife. In addition, the Council will also take steps to upgrade/improve existing stock where appropriate.

Action:

Aitken, Colin - Markinch, Glenrothes

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Consider the allocation of 200-400 houses for Markinch as shown in Draft Plan Schedule H3 is excessive and would alter the character of the village. Further development at Glenrothes south and east could meet any shortfall.

Response:

Noted. Markinch is identified in the Finalised Structure Plan as a Strategic Land Allocation. A further 400 new houses are proposed over the next 20 years. This allocation is an increase from the consultative draft Structure Plan which identified 200-400 houses over the same period. The Kirkcaldy and Mid Fife Local Plan will identify specific sites to meet this allocation. The potential contribution from Markinch will be monitored and reviewed as necessary.

Glenrothes is identified in the Finalised Structure Plan as a Strategic Land Allocation. A further 900 new houses are proposed at Glenrothes East over the next 20 years. The Kirkcaldy and Mid Fife Local Plan will identify specific sites to meet this need. The allocation of 900 housed is a reduction from the consultative draft Structure Plan which identified 2,450 houses over the same period.

Action:

Markinch housing allocation increased from 200-400 to 400 in the Finalised Structure Plan. Glenrothes housing allocation reduced from 2,450 to 900 in the Finalised Structure Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The Draft Structure Plan as the basis for the new Local Plan raises concerns. Object to development in the Dalginch area of Markinch, and to proposals to increase the size of development at The Glebe.

Response:

Noted. Markinch is identified in the Finalised Structure Plan as a Strategic Land Allocation. A further 400 new houses are proposed over the next 20 years. This allocation is an increase from the consultative draft Structure Plan which identified 200-400 houses over the same period. The Kirkcaldy and Mid Fife Local Plan will identify specific sites to meet this allocation. The potential contribution from Markinch will be monitored and reviewed as necessary. Kirkcaldy and Mid Fife Local Plan will identify specific sites.

Action:

Housing allocation increased from 200-400 to 400 in the Finalised Structure Plan.

Manson, Bruce - Markinch, Glenrothes

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Settlement coalescence must be prevented between Markinch, Coaltown of Balgonie, Star and Glenrothes through rigorous protection of greenfield sites and the extension of the existing Area of Great Landscape Value to the south to protect Star, Balgonie and Markinch. A long-term stable boundary should be created from the North all along the railway track and the medieval pathway to Westgate and Muriespot on the 2003 Local Plan Proposals Map.

Response:

Policy SS1, which guides the detailed identification of land for future development via the Area Local Plans, clearly requires the avoidance of settlement coalescence.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Given the significant recent development to the west of Markinch, a clear long-term stable boundary should be drawn along the main railway line, preserving attractive open countryside to the east of the settlement. The construction of 200-400 houses to the east of the settlement would destroy an area of considerable landscape quality between Dalginch, Brunton and Barnslee.

Response:

Noted. The detailed issue of land use allocation will be addressed via the Area Local Plan, Master Plans and development briefs.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

In relation to the housing allocation at Markinch in Draft Plan Policy H2, it should be noted that many of the 2,450 houses allocated in the current Local Plan to the south and east of Glenrothes will be within an area designated as S4 in the approved Glenrothes Local Plan (March 2003). This land presses tightly up against the southern boundary of Markinch, and will destroy open countryside to the south. If development takes place here, as well as in the area to the east of the railway line, the town will effectively be incorporated within Glenrothes. Given the amount of recent development and development already contained in existing development plans, the town has the capacity for only a further 25 houses in carefully selected sites.

Response:

Noted. Markinch is identified in the Finalised Structure Plan as a Strategic Land Allocation. A further 400 new houses are proposed over the next 20 years. This allocation is an increase from the consultative draft Structure Plan which identified 200-400 houses over the same period. The Kirkcaldy and Mid Fife Local Plan will identify specific sites to meet this allocation. The potential contribution from Markinch will be monitored and reviewed as

necessary.

Action:

Housing allocation increased from 200-400 to 400 in the Finalised Structure Plan.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Markinch

Comment:

While it is acknowledged that the detailed planning of historic towns is a matter for subsequent Local Plans, it is important that Structure Plan's proposals do not compromise the essential character of historic towns. The proposal to construct 200-400 houses in Markinch, combined with those already committed, is likely to damage the town's character. If such development were to take place to the east of the railway, then important views of the 12th century church from the north-east, east and south-east would be severely compromised. If such development took place within the existing built-up area, the townscape character would be damaged. It is noted that proposals for around 80 houses on the village green or glebe have been shown to residents.

Response:

Further consideration has been given to strategic land allocations in finalising the Structure Plan. 400 new houses have been allocated at Markinch over the next 20 years. The emerging Kirkcaldy and Mid Fife Local Plan will identify the specific sites to meet the first 10 years of this need, taking full account of issues mentioned to ensure no significant loss of character of the town.

Action:

Clarify allocation of 400 units.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

Any proposal to construct 200-400 houses in Markinch would spill development over the railway line, damaging important areas of open countryside to the east of the railway line. The area around Brunton and Dalginch is of exceptional landscape value, and an important archaeological area. It is also noted for barn owls, hen harriers and other wild life (CFRC survey - by Anne-Marie Smout). Now that the threat of open-cast mining is receding, the area should become an extension of the Area of Great Landscape Value to the north and be opened up for local people with improved footpaths and better access to areas of historical, ecological and landscape importance.

Response.

Local landscape designations are under review. "Area of Great Landscape Value" designation may become obsolete during life of the Plan. Local Plan reviews will consider landscape policy.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Infrastructure

Comment:

The investment in infrastructure that would be required to cater for 200-400 houses to the east of the railway line near Markinch would be considerable. Important thresholds would be crossed and the resulting over-capacity of provision would encourage further development.

Response:

As stated in Policy SS1 infrastructural capacity is a consideration in selecting appropriate land for development, but not the sole consideration. Plan identifies where new infrastructure is required and identifies mechanisms to secure its timeous provision.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The future growth of Mid Fife will depend on the quality of the environment. Many town centres and rural areas have been progressively eroded by inappropriate development, rendering the area unattractive to incomers. The overall aim in Mid Fife must be to protect attractive green field sites at all costs, whilst directing housing and industrial development to brownfield sites. No further development should take place on greenfield sites in Mid Fife. Inward migration to the area will be achieved by protecting the remaining rural landscape and upgrading unattractive sites by steering developers onto brownfield land. Strict controls on our best land will not deflect developers from the area. Specifically, no land to the east of Markinch should be developed, particularly the land adjacent to the Area of Great Landscape Value in the Dalginch-Brunton-Barnslee area.

Response:

The aim of the Finalised Structure Plan is to achieve all the aims mentioned in the comment in a planned manner. The detailed delineation of areas for future development clearly requires the avoidance of settlement coalescence. The Council seeks to re-use appropriate brownfield sites as a priority. However, the scale of proposed development may require the allocation of greenfield land.

Action:

Markinch Heritage Group, McKnight, Rachael - Glenrothes

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Draft Plan Policy H2 and Schedule H3, the proposed future allocation of 200-400 houses to Markinch could only take place within the town itself if any remaining green sites were developed at high density or if more infill development took place. Either way the heritage and historical character of the town would be severely compromised. Development outside the town (as defined by the 2003 Local Plan) could only take place to the east, as the land to the south is already scheduled for housing under the existing plan (S2). Would argue that Markinch has reached its natural boundaries and its housing capacity, and that future housing needs should be met elsewhere, particularly on less attractive sites where housing would be an environmental improvement e.g. along the Glenrothes-Kirkcaldy axis.

Response:

Noted. The detailed issues of land use allocation will be addressed via the Area Local Plan. Markinch is identified in the Finalised Structure Plan as a Strategic Land Allocation. A further 400 new houses are proposed over the next 20 years. This allocation is an increase from the consultative draft Structure Plan which identified 200-400 houses over the same period. The Kirkcaldy and Mid Fife Local Plan will identify specific sites to meet this allocation. The potential contribution from Markinch will be monitored and reviewed as necessary in response to comments received.

Action:

Housing allocation increased from 200-400 to 400 in the Finalised Structure Plan.

Dumbreck, J - Dysart, Kirkcaldy

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Kirkcaldy East

Comment:

Noted that the Structure Plan proposes a total of 1,750 houses to be built over the next 20 years to the east of Kirkcaldy/Dysart. Are aware of developer interest in the area and, as landowners, have been approached with regards to the sale of property in the area between Boreland and Wemyss Road. Have no intention of selling this property during the remainder of our lifetimes. Appreciate that this area will probably be designated for house building in the future, but hope that development would only be allowed on a small-scale. Believe that it is not the best area for a large-scale housing estate and it should be left as greenfields, without unnecessary disturbance to the adjacent residents and to the road.

Response:

Further consideration has been given to the strategic land allocations in finalising the Structure Plan. The development to the East of Kirkcaldy is considered acceptable in terms of location and provides an excellent opportunity to provide strategic infrastructural improvements and to locate development close to the proposed new rail station. The emerging Kirkcaldy and Mid Fife Local Plan and masterplan will identify the specific sites to meet the strategic land requirement. The community and landowners will be consulted fully during this process.

Action:

The housing allocation at Kirkcaldy East has been increased to 2,500 new houses over the 20 year period.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The preference should be to use the Kingslaw opencast site for development which would be in accordance with Policy H3 of the Draft Structure Plan. At Kingslaw, the bunds to protect adjacent housing are already in position. The fields have already been torn up, and new roads and an approach roundabout have already been built. Further road improvement plans exist and there is a possible rail link location.

Response:

Noted. Kirkcaldy East is identified in the Finalised Structure Plan as a Strategic Development Area, allocated for 2,500 houses. This allocation is an increase from the consultative draft Structure Plan that identified 1,750 houses over the same period. This change has been made in response to the comments received on the draft Plan.

Action:

Housing allocation increased from 1,750 to 2,500 in the Finalised Structure Plan.

Rab Hutton, Per Mr E McPherson, Hutton, Robert - Limekilns, Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Lochgelly

Comment:

Supports the settlement strategy as set out in the Draft Structure Plan and welcomes the inclusion of Lochgelly within Policy SDA1, as the scale of development envisaged is seen to be particularly beneficial in aiding the regeneration process within the town.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Lochgelly

Comment:

Submits that development in the north of Lochgelly would achieve a number of benefits. The area has proved attractive to house builders and purchasers and is well-located in relation to community facilities and public transport. It has less significant physical constraints to development than land to the south, and would be integrated with the existing community.

Response:

The detailed allocation of land for future development in the Lochgelly area will be undertaken as part of the exercise to produce the draft Area Local Plan. The preparation of this Plan will be the subject of a full public consultation exercise.

Action:

Tayport Community Council, Massie, Jean - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Given the interest in proposals for the Tay Bridgehead considers that there should have been another public meeting in Tayport in addition to those in Newport-on-Tay. This would have reduced the number of cars travelling to Newport. The meeting should have been more strongly chaired as this would have reduced the number of personal attacks which should have been dealt with more firmly.

Response:

The turn-out for the meeting is Newport-on-Tay was far in excess of that for previous Development Plan meetings. The second meeting was held to allow the involvement of those who could not gain entry to the first meeting. Account of the level of interest will be taken in planning further consultation exercises and the suggestion of a meeting in Tayport is noted.

Action:

Review consultation process.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Asks how Fife Council defines "affordable housing".

Response:

The definition of affordable housing used in the Finalised Structure Plan and Supplementary Guidance is consistent with that contained in SPP3 and PAN 74. It is a broad definition which covers a range of tenures.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Concern about the proposed number of houses for the Tay Bridgehead area. Justification is required to support this allocation. Consider that in Tayport the infrastructure is inadequate to provide support for an additional 150 houses.

Response:

Concerns noted. Policy SS1 and Policy DC1 aim to ensure that infrastructure appropriate to each development is provided. The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan.

Action:

Housing allocation reduced from 750-950 to 500 houses.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

Queries the status of Spearshill regarding the Area of Great Landscape Value (AGLV) and requests clarification.

Response:

Detailed boundary of AGLV shown on adopted Local Plan. Due to possible changes to local landscape designation, AGLVs are not shown in draft St Andrews and East Fife Local Plan.

Action:

Royal Burgh of St Andrews Community Council, Goudie, Ian - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Dissatisfaction with the public consultation, particularly the simultaneous publication of the Structure Plan and Local Plan.

Response:

Concerns noted. It was considered that there are benefits in allowing people to see the detailed proposals in the Local Plan which implements the Structure Plan.

Action:

Review consultation process.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Should avoid simultaneous consultation on six important documents. Reports problems with accessing the Local Plan maps online.

Response:

Concerns noted with regard to the number of documents but they provided inter-related information. Problems with accessing Local Plan maps and documents online are being addressed.

Action:

Review consultation process.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The Report of Survey does not provide adequate background information in support of the Plan.

Response:

The Report of Survey ha been reviewed and it provides more detailed information to clearly support the policies in the Finalised Plan.

Action:

The Report of Survey has been amended to provide more detailed information, particularly in respect of the strategy and demographics.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Question the need to review the Structure Plan at this time and to extend the planning horizon to 2026. Suggests that this is driven by the City Region debate.

Response:

Scottish Executive requires up-to-date plans which provide long term certainty for all planned land uses.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Suggests that the strategy does not fit with national strategy and that increasing the population of Fife is a questionable aim.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projections of 9.1% growth, are realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section of demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The Plan's strategy for St Andrews follows the National Planning Framework which was formulated without reference to residents of the town.

Response:

The National Planning Framework 2004 was prepared with extensive stakeholder involvement and will be reviewed in 2008.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The requirement for the plan to cover a 20-year period reflects a lack of joined-up thinking at Executive level as GRO household projections do not extend beyond 2016.

Response:

The Finalised Structure Plan includes proposals to monitor the Plan and review it by 2009 to ensure that the framework contained within remains valid.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Concern that little account has been taken of the St Andrews Strategic Study, 1998, and that there has been no change in the interim to suggest that it does not remain valid.

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Questions Fife Council's current view of the Study and how it sits with current proposals.

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Objects to the dilution of Policy ENV1 in comparison to the Structure Plan 2002 and suggests that the new policy undermines the purpose of the Green Belt. Calls on Fife Council to re-introduce a new Green Belt policy at least as strong as that in the Approved Plan and seeks a clear statement that there is a presumption against development in the Green Belt.

Response:

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries.

Action:

Policy and text amended.

Comment No: 11

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Action Plan

Subject: Education

Comment:

The Structure Plan fails to provide a coherent vision for the future of secondary school provision in Fife. Call for the provision of a new school in North Fife.

Response:

Fife Council is undertaking a review of the delivery of education services for the whole of Fife as part of the Schools Estate Strategy exercise. School places will be provided timeously to meet the planned growth in population. Also information in Proposal DC1 of Finalised Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Cannot rely on population increase to solve the existing problems. Expansion proposed for St Andrews would increase problems of school provision.

Response:

Fife Council is not relying on population increase to solve existing problems in East Fife. School places will be provided timeously to meet the planned growth in population.

Action:

No Change

Comment No: 13

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

Question the reliance of the Plan's economic development strategy on a single sentence in the National Planning Framework and its focus on growing St Andrews without an understanding of the limitations on such growth.

Response:

By its nature, the National Planning Framework is not overly detailed on any topic. St Andrews has a vital role in creating employment opportunities. The Structure Plan is complemented by the Fife Economic Development Strategy.

Action:

No Change

Comment No: 15

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

Objects to those parts of Proposal PE1 that pertain to St Andrews. There is support for encouragement of spin-off ventures from University research, but it is not considered that there is a substantial supporting case to justify a land allocation of the scale proposed.

Response:

Objection noted. The land allocation in this area is considered to be appropriate in view of the 20-year plan period, and the fact that the Finalised Plan designates a Strategic Development Area there.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

The first bullet point of para 3.22 should be deleted. Reference to St Andrews as a world class destination is considered to be offensive to many people who regard the town as already world class in many senses. No account has been taken of the problems in terms of infrastructure and the lack of a rail link. Oppose focus on "tourism and visitor-related retailing" rather than meeting local needs.

Response:

Wording in para 3.22 has been deleted. There is scope to improve all town centres including St Andrews. The focus on tourism and visitor-related retailing is not intended to be at the expense of local needs. It is acknowledged that St Andrews town centre serves important local needs.

Action:

Para 3.22 deleted *Comment No:* 17

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Population Growth

Comment:

Report of Survey does not adequately justify a 5% population increase. Replace "annual" with "total" in para 5.245 in reference to population growth.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Housing Land Requirement

Comment:

The General Register Office for Scotland have not produced sub-national household projections beyond 2018. Assume that footnote to the fig 5.46 is incorrect and that household sizes for 2021 and 2026 have been generated by Fife Council. Question the extrapolation of data.

Response:

Acknowledge that footnote is incorrect. This is amended to include reference to extrapolation by Fife Council. These figures give an indication of projected household size and will be monitored and updated to reflect biennial updates by the Scottish Executive.

Action:

Change to footnote at fig. 5.46.

Comment No: 19

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Housing Land Requirement

Comment:

No justification given for the disaggregation of the total household change figure of 16,122 in fig 5.47, but are substantial differences between HMAs. Argue that overall increase in number of households should be applied uniformly across the HMAs.

Response:

The disaggregation of Household Change (16,122) by HMA is based on the population and the number of households in each HMA. This is the core supply on which additional assumptions are made

Action:

No Change

Comment No: 20

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Housing Land Requirement

Comment:

Para 5.252 "It is considered that the vacancy rate across Fife will not change significantly over the plan period "is inconsistent with para 5.251 which describes the demolition programme as "clearance of hard-to-let stock". The application of an uniform vacancy rate across Fife is unjustified and does not reflect position in St Andrews and Cupar HMAs. Propose a 2% vacancy rate for the St Andrews and Cupar HMAs.

Response:

The vacancy rate is the smallest component affecting the overall housing requirement. To keep the underlying housing model easy to understand and simple to implement, it is preferable to operate a single standard rate across Fife. The vacancy level of 3% is already at a low level and there is not a wide variation across Fife.

Action:

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Population Growth

Comment:

Questions the figures for additional population growth and aspiration to increase by "some 12,000 over and above the GRO(S) projection." Regard a target of 5,000 above extrapolation of the GRO(S) projection as more appropriate. Concerns about rounding of numbers in fig 5.51.

Response:

Response to Comment 05 answers your concerns. Concerns about rounding noted. However, this is a standard approach.

Action:

Demographics work has been updated, the details of which are contained in the Report of Survey.

Comment No: 22

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Object to the housing land requirement for the St Andrews and East Fife Local Plan area as outlined in Schedule H1 and provide alternative figures. Comparison with 2002 Structure Plan figures highlights weakness in the methodology.

Response:

Objection noted. SPP3 and the calculation of the housing land requirement is set out in the Report of Survey and accords with PAN38. This includes consideration of both local need and inward migration, with indigenous household change accounting for the majority of the requirement.

Action:

No Change

Comment No: 23

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Housing Land Requirement

Comment:

Assertion in para 5.265 that the "short-term trend is downwards" i.e. the contribution from windfall sites has little statistical validity. Para 5.256 does not accord with para 5.266 in relation to the contributions for the St Andrews and Cupar HMAs. Propose revision of urban capacity and windfall sites contributions for these areas.

Response:

Urban Capacity supply for each HMA is assessed via an annual audit and the 2005 figures have informed the revised housing requirement. The windfall contribution is set through the Structure Plan and this figure conservatively estimated at 160 units per annum. The Report of Survey gives further explanation.

Action:

Report of Survey updated.

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Housing Land Requirement

Comment:

Highlight discontinuities in fig 5.57 and a lack of justification for assumed outputs from small sites. Agree with para 5.267 that "the vast majority of approvals will result in development" and regard on assumed 80% completion rate as the minimum that could be realistic.

Response:

Small sites are expected to make a reduced impact on the overall supply due to having an up-todate Plan in place which will identify new major housing sites. It is expected that the number of farm steading conversions will decrease as there are fewer available for development.

Action:

No Change

Comment No: 25

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Object to the proposed housing allocation for St Andrews specified in Schedule H3 based on the comments submitted in relation to the Report of Survey.

Response:

Objection noted. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Draft Plan Policy H3 should be strengthened significantly, as the requirement to "provide a range of sites, tenures and house types", is too vague and weak to tackle the major housing problems of St Andrews. It cannot be assumed that the appropriate house types will naturally emerge as a result of the market economics.

Response:

Disagree. Finalised Plan H2 (Draft Plan Policy H3) sets the context within which the Area Local Plan will identify sites for development and provide detailed guidance. It is outwith the remit of the Development Plan to prescribe individual house types.

Action:

No Change

Comment No: 27

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Draft Plan Policy H3 should be revised to require Local Plans to disaggregate the housing land requirement for each HMA by both tenure and household size. The corresponding Policy in the 2002 Structure Plan, which opened with the words "Local Plans, rather than planning applications" is the preferred means of identifying sites for development and no reason for weakening it by the admission of the subsidiary cause is considered relevant.

Response:

Disagree. This level of disaggregation is not within the remit of the Structure Plan, which identifies the broad amount and location of new housing land. The current wording gives sufficient clarity and support for a plan-led approach. Finalised Plan H2 was Draft Plan Policy H3.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Draft Plan Policy H5 is inadequate to meet the exceptional circumstances of St Andrews. The proposed use of Section 75 agreements offer little reassurance that affordable housing will remain so in perpetuity. Developer-led funding would deliver three un-needed houses for every affordable one if Scottish Executive's figure of 25% is used. It is preferable for land to remain undeveloped until a better funding mechanism can be secured.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the Council will use legal mechanisms and/or Section 75 agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing. The percentage requirement for the St Andrews Housing Market Area has been reduced to 30% in light of PAN 74, the public consultation and the updated Housing Needs and Affordability studies. The provision of affordable housing through the planning system is a legitimate means of contributing to meeting the need for affordable housing. This is supported by Scottish Executive's planning policy. Many other Local Authorities across Britain are using this approach.

Action:

No Change

Comment No: 29

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Affordable housing that remains affordable is the most important type for St Andrews, including rented accommodation. Wish to see sites allocated exclusively for this purpose: propose for inclusion in Policy H5 that the affordable component should be completed within a similar timescale to the non-affordable.

Response:

Whilst sites exclusively for affordable housing have a role to play, in general it is preferable to bring forward sites of mixed tenure to ensure diverse and balanced communities. This is an objective of both Fife Council and the Scottish Executive. Agree that affordable housing should be completed in a similar timescale to mainstream housing - this is covered in the Supplementary Guidance on Affordable Housing. It is too detailed for Finalised Structure Plan Policy H4 (was Draft Plan H5).

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Supports Draft Plan Policy H6 but notes that does not address issues of affordability or retention.

Response:

Policy H6 has been deleted from the Finalised Structure Plan although references to affordable housing and non-residential development remains.

Action:

Delete Draft Plan Policy H6.

Comment No: 31

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Object to the weakening of the wording of Draft Plan Policy H7 by the omission of "proposals which would result in the Housing Land Requirement being exceeded would not normally be supported", as in the approved Structure Plan.

Response:

Objection noted. Draft Plan Policy H7 now Finalised Plan Policy H5.

Action:

No Change

Comment No: 32

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Density

Comment:

The Community Council object to Draft Plan Policy H8 which, however well intentioned, needs a counterbalancing clause to give adequate recognition to the need to ensuring housing developments are compatible with their surroundings. The requirement for high densities in town centres will encourage inappropriately tall buildings. St Andrews Conservation Area has been marred in recent years by a number of developments of this type.

Response:

Objection noted. Draft Plan Policy ENV3 seeks to ensure that development is designed to respect individual context and integration with surroundings. The Fife Urban Design guide "Creating a Better Fife" gives further guidance as to how this can be achieved. Draft Plan Policy H8 now Finalised Plan Policy H6.

Action:

Draft Plan Policy ENV3 will be included in Area Local Plans. Changes to the Finalised Plan Policy H6 have been made in response to the wider comments about density.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

The version of Policy T1 contained in the 2002 Plan required developers to "provide adequate cycle facilities where appropriate". Object to the omission of this clause and query omission of the clause relating to air pollution.

Response:

Policy T1 refers to "the provision or use of...cycle routes" in relation to development proposals. Air pollution is monitored, via other legislation, by Fife Council services.

Action:

No Change

Comment No: 34

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Policy T4 and clause to safeguard the disused railway network does not assist with the reinstatement of a St Andrews rail link, and would sterilise the former route to no purpose. Suggest that the policy includes a provision for Local Plans to identify any parts of the disused rail network to which Policy T4 would not apply, subject to a firm requirement that an appropriate alternative alignment be designed and safeguarded. Policy T4 should also require Local Plans to identify and safeguard a connected network of off-road cycle routes.

Response:

The Local Plans will implement Policy T2 (T4 in the Draft Plan) and identify land required for possible future uses. Forward planning for cycle routes will be achieved via the Core Paths Plan see Policy ENV6 (Draft Plan Policy ENV8).

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Object to clause in Proposal PT2: "further consideration of transport link options to the rail network to St Andrews, through the review of Local Transport Policy", as it is too weak. Reinstatement of the rail link would benefit St Andrews, Cupar and other parts of East Fife. Suggest inclusion in Proposal PT2 of "land for the following routes and facilities will be identified in Local Plans and safeguarded from prejudicial development. A rail link from the East Coast rail line to a new station in St Andrews, following an alignment on the Southern side of the A9."

Response:

The wording of Proposal PT2 (PT1 in the Finalised Plan) accurately reflects the current status of the proposal. The St Andrews and East Fife Local Plan will identify any specific sites referred to in the proposal.

Action:

No Change

Comment No: 36

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

Objects to the omission of Policy N7 of the 2002 Fife Structure Plan. Disappointed at lack of protection for the coastal environment.

Response:

Coastal protection policies will be contained in Area Local Plans.

Action:

No Change

Comment No: 37

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Built Environment

Comment:

Seeks revised versions of Policies B1 and B2 of the 2002 Fife Structure Plan in Fife Matters. This should include a statement that developments that detract from the character of Conservation Areas or adversely affect the character or settings of listed buildings will not be supported. Disappointed that Conservation Areas are not defined in the glossary, and the section on the Built Environment now has no accompanying policies.

Response:

Policies to protect the built environment and archaeological heritage are contained in Local Plans. The Scottish Executive is seeking more strategic and shorter Structure Plans and this is reflected in the Finalised Structure Plan. Policies contained in a Local Plan have the same 'weight' as those in a Structure Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Built Environment

Comment:

Seeks explicit recognition of the beneficial role of green spaces within the urban environment.

Response:

This issue addressed is in the current and emerging Local Plans.

Action:

No Change

Comment No: 39

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

Seeks the reintroduction of Policy C3 from the 2002 Fife Structure Plan.

Response:

Issue will be addressed in Area Local Plan. The Finalised Structure Plan focuses on key strategic issues.

Action:

No Change

Comment No: 40

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

Propose the reintroduction of Policy B3 from the 2002 Fife Structure Plan.

Response:

Issue will be addressed in Area Local Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

Propose the reintroduction of Policy C1 of the 2002 Fife Structure Plan. This restricted development in areas of low flooding risk and it is considered that the one line in new Policy SS1 is inadequate.

Response:

Issue will be addressed in Area Local Plans. SPP7 must be complied with. Do not consider there is a need to repeat this within the Structure Plan.

Action:

No Change

Comment No: 42

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

Draft Plan Para 5.5 focuses on Broadband, but Draft Plan Policy C2 can also apply to mobile phone technology. Guidance is required to the siting of mobile phone masts.

Response:

Detailed guidance/policy will be provided within Area Local Plans. This is not considered to be a strategic issue. Draft Plan Policy C2 incorporated into Finalised Plan Policy C1.

Action:

No Change

Comment No: 43

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

The Draft Plan is less accessible than the plan it replaces and sections are unclear.

Response:

Concern noted. The Finalised Structure Plan seeks to provide a greater degree of strategic guidance. Issues of lesser strategic importance are included in Area Local Plans.

Action:

The Burgh of Ladybank and District Community Council, Croll, David - Ladybank, Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

It was not a good idea to review the Local and Structure Plans simultaneously, due to the size of the documents and because of the relationship between the two. The Structure Plan should be finalised in advance to give the Local Plan consultee greater certainty and clarity.

Response:

Concerns noted. Whilst noting the comment re timing of preparing the two plans it was beneficial in allowing the people to see the detailed proposals in the Local Plan which implements the Structure Plan guidance. A number of objections in other areas arise because there is no data on where development is proposed.

Action:

Review consultation process.

Elie and Earlsferry Community Council, Lamond, William - Elie, Leven

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

Agriculture and farming should be addressed in the Plan where planning system can have an influence, in relation to countryside access, nature conservation and farm diversification.

Response:

The planning system has very limited controls over agricultural activities and those subject to control are not of a strategic scale.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Hope that residential development will assist in regeneration and reversing depopulation, rather than creating commuter settlements (para 1.16).

Response.

This is the Vision for Fife in 2026.

Action:

No Change

ID 0126

Royal Burgh of Cupar & District Community Council, Drummond, Gavin - Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Cupar

Comment:

Support growth of Cupar to facilitate development of affordable housing and associated infrastructure but concerned at scale of housing requirement for Cupar area.

Response:

Support and concern noted.

Action:

Boarhills and Dunino Community Council, Raeside, Stuart - Dunino, St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

Proposes creation of cricket/football pitch at Kingsbarns. Suggests there is potential for further housing development at Dunino and Boarhills.

Response:

These matters are more appropriately dealt with in the emerging St Andrews and East Area Local Plan.

Action:

Carnbee and Arncroach Community Council, Lodge, Janet - Carnbee, Anstruther

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Concerns centre on transport links, with support for the extension of the rail line to Leven. Support for a Cross-Forth ferry from Kirkcaldy to Leith for reduced car dependence and for a train station at Edinburgh Airport.

Response:

Support noted.

Action:

Auchtermuchty and Strathmiglo Community Council, Cowling, David - Gateside, Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Effectiveness of the consultation is diminished by a lack of co-ordination with the consultation by the Education Service and co-ordination with other community Plan partners.

Response:

Fife Council does have a consultation strategy which seeks to avoid consultation overload where possible.

Action:

Review consultation process.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Accept the main thrust of the plan in its focus on Kirkcaldy and Mid Fife.

Response:

Support noted.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

Accept long term growth of Dunfermline and development of Rosyth as a 'European Gateway'.

Response:

Support noted.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

Doubts that economic regeneration and population growth can be achieved through an overallocation of the housing requirement. This is 'borrowing prosperity' from Fife's neighbours rather than building an economic role for Fife.

Response:

The Finalised Structure Plan is not based merely on providing housing land. The strategy is to provide additional employment land and regenerate areas to improve their economic competitiveness. The National Planning Framework recognises South Fife and West Edinburgh which are seen by Scottish Enterprise as a key economic development zone.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

In the Forth and Tay Bridgehead areas and St Andrews, employment opportunities are linked to, and dependent on, the estuarial (road) crossings, which have reached capacity. Development of a new 'multi-modal crossing at Queensferry will be very long-term and does not support the Plan's short-term growth ambition. The potential to capitalise on rail infrastructure is not realised.

Response:

Disagree. There is capacity in the system for some time in the foreseeable future. A series of actions designed to increase rail capacity are being implemented i.e. lengthening platforms to allow the use of a greater number of carriages. Greater capacity in rail based park and ride facilities are also planned.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

"Growing Fife" must first be about economic growth, rather than housing development.

Response:

The two are inter-linked.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Challenge will be to manage growth of St Andrews in a sustainable way. Suggest that the influence of 'St Andrews World Class' will have implications for the countryside beyond the proposed Green Belt, such as population growth, increase in short-term visitors and in traffic. Draft Structure Plan does not mention strengthening of West/East road links in East Fife.

Response:

Comments noted. While agree that St Andrews World Class will have implications beyond the town, development arising from this will be subject to Development Plan policies which would ensure that its impacts are managed in a sustainable manner. The Local Transport Strategy and Area Transport Plan address road links in East Fife.

Action:

Falkland and Newton Community Council, Garrett, Anthony - Falkland, Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

Disappointment that Falkland is not mentioned in the written statement or in the Report of Survey.

Response:

The Structure Plan does not mention every settlement in Fife. There are no strategic proposals for Falkland.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Boundary Changes

Comment:

Concern that due to Local Plan boundary changes, development in Falkland will get lost in the wider planning for larger projects in the Kirkcaldy and Mid Fife Local Plan.

Response:

The public will be consulted on proposals for any future development in Falkland in the process of preparing the Kirkcaldy and Mid Fife Local Plan.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

Seeks clarification of the links between the Structure Plan and Local Plan as concerned that development could be proposed in the Local Plan which was not suggested in the Structure Plan.

Response.

Statutory requirement that Local Plans are generally consistent with Structure Plans. Local Plans provide more detailed policies and development proposals consistent with the Structure Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Considers that the Policy behind the consultation documents was sound, but there were too many documents at the same time.

Response:

Support for policy behind consultation noted. Concerns about the number of documents noted. However, they were inter-related and needed to be read in context.

Action:

Review consultation process.

North Glenrothes Community Council, Page, Ron - Glenrothes

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Accept the Structure Plan aim of increasing Fife's population.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Agree with paras 1.8, 1.17 and 1.19, that key transport developments are essential to the future of Fife, especially better links between Kirkcaldy, Glenrothes and Levenmouth, the A92 and a new Forth crossing.

Response:

Support noted.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Sustainable communities (p11) should mention leisure and recreation facilities, as should "Fife in 2026".

Response:

These issues are dealt with in the Core Policies for the Area Local Plans.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Glenrothes

Comment:

Support development proposed for Glenrothes, but this should include leisure and recreational facilities.

Response:

Support noted. Land for these facilities will be identified via the Area Local Plan.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

Questions the role of Glenrothes as complementary to Kirkcaldy. Suggests that Glenrothes has more opportunity for expansion.

Response:

Reference to Glenrothes' complementary role has been deleted in the Finalised Plan. The Finalised Plan now clarifies the retail hierarchy. Kirkcaldy is the largest shopping centre in Fife and is better served in connectivity terms than Glenrothes. As such the Council's priority is to focus on Kirkcaldy and Dunfermline. However, it also supports the role of Glenrothes

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Public transport should be improved with a railway link at Glenrothes, development of Markinch station and consideration given to the railway link from Markinch to Glenrothes. Draft Plan Proposal PT2 should include support for an upgrade or replacement of the A8000.

Response:

Suggestion for rail link between Markinch and Glenrothes noted. Finalised Plan Proposal PT1 lists projects which are wholly or partly within Fife. The M9 Spur Extension/A90 Upgrading (A8000 Upgrading) is being implemented by Forth Estuary Transport Authority of which Fife Council is a member.

Action:

Milton and Coaltown of Balgonie Community Council, Ritchie, Peter - Coaltown of Balgonie, Glenrothes

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Public meeting in Glenrothes was disappointing in focusing on the St Andrews Local Plan rather than the implications of the Draft Structure Plan for Central Fife.

Response:

Concerns about the content of the discussion noted but Fife Council should respond to those who attend public meetings and the topics they wish discussed, if they are in any way relevant.

Action:

Review consultation process

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Glenrothes

Comment:

Opposition remains to any major employment-related or housing development around Coaltown of Balgonie. Disappointment that this appears to have been ignored in preparing the Draft Structure Plan. The proposed development will swallow up the village and result in loss of identity. Oppose the Plan's objectives relating to SDAs, particularly at Glenrothes, and seek a commitment to establishing a defined boundary for the village.

Response:

Opposition noted. Further consideration has been given to strategic land allocations in finalising the Structure Plan. The strategic land allocation has been reduced at Glenrothes to reflect the additional supply now proposed at Kirkcaldy East to assist in delivering key strategic infrastructural improvements for Mid Fife and the significant capacity within the urban area for housing development. The strategic allocation for Glenrothes is to Glenrothes East.

The emerging new Kirkcaldy and Mid Fife Local Plan will identify the specific sites to meet the strategic land allocation together with other sites.

Action:

Strategic land allocation reduced to 900 to Glenrothes East.

Largo Area Community Council, Marshall, Jill - Upper Largo, Leven

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Infrastructure

Comment:

Infrastructure should be provided to service new housing and business development, rather than impacting on existing structures.

Response:

It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

Ribbon development should be avoided.

Response:

Policy SS1 identifies the need to avoid coalescence.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Consideration should be given to use of solar energy in new housing development.

Response:

There are no planning powers currently available in Scotland to require installation of renewable energy technologies. Should this change, appropriate revisions would be made to Area Local Plans

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Support for a passenger rail link to Levenmouth.

Response:

Support noted.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Proposal should include reference to upgrading of A8000.

Response:

Suggestion for rail link between Markinch and Glenrothes noted. Finalised Plan Proposal PT1 lists projects which are wholly or partly within Fife. The M9 Spur Extension/A90 Upgrading (A8000 Upgrading) is being implemented by Forth Estuary Transport Authority of which Fife Council is a member. Draft Plan Proposal PT2 now Finalised Plan Proposal PT1.

Action:

Draft Plan Proposal PT2 now Finalised Plan Proposal PT1.

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Suggests inclusion of a target for the reduction of greenhouse gas emissions other than the objective to encourage renewable energy.

Response:

No greenhouse gas emission target is set at Fife level.

Action:

Kennoway Community Council, Simpson, Alison - Bonnybank, Leven

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Transport policy does not meet the requirements of the next 20 years. Consideration should be given to upgrading the Standing Stane Road to dual carriageway.

Response:

The transport Policies and Proposals are based on a thorough analysis of requirements over the plan period as detailed in the Report of Survey. Additional transportation modelling has been carried out in support of the plan, which has identified further projects for inclusion in Finalised Plan Proposal PT1.

Action:

Amend text to include reference to Standing Stane Road link.

Crossford Community Council, Hay, Doug - Crossford, Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Supports the regeneration of Mid Fife, but questions how increasing the population of Dunfermline will benefit existing communities. Suggests that large housing allocations in West Dunfermline will have an adverse impact on revitalising Central Fife.

Response:

Support noted. The Finalised Structure Plan focuses on addressing the problems of Mid Fife but cannot ignore the needs of the Dunfermline area over the life of the Plan.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Concern that HLR is based on an assumed constant level of migration.

Response:

The level of migration is based on figures received from the GRO, which assume a constant level of migration for a given 5-year period. As part of the monitoring of the Development Plan, any revision of migration assumptions is taken into consideration and Plan reviews or alterations undertaken as necessary.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Dunfermline

Comment:

Do not support plans for a "concentric" expansion of the city. This would result in coalescence with Crossford and Cairneyhill, in conflict with Policy SS1.

Response:

Policy SS1 seeks to prevent coalescence. The boundaries of the areas where development is proposed will be drawn as part of the exercise of preparing the Dunfermline and West Fife Area Local Plan. The term "concentric" may be misleading and has been reviewed in finalising the Structure Plan.

Action:

Term 'concentric' has been changed.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

The Structure Plan should identify the areas of Green Belt prior to the formulation of the Local Plan.

Response:

Policy should only specify areas in very general terms as Key Diagram is non-Ordnance Survey based. Local Plans are the best mechanism to delineate detailed boundaries.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

Para 4.24 should include more detailed information on implementation, particularly with reference to South West Dunfermline and its historic views to/from the Glen and the Abbey.

Response:

The Finalised Plan at Chapter 4 sets out strategic policies while more local protection of the environment policies will be implemented via the Dunfermline and West Fife Local Plan. A Green Belt will be defined through the next Local Plan.

Action:

Touch and Garvock Community Council, Reid, Peter - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Dunfermline

Comment:

The mistakes of the Dunfermline Eastern Expansion (DEX), particularly the provision of infrastructure, should not be repeated.

Response:

It is intended that infrastructure and other services will be provided at the correct time. Lessons learned from DEX have been addressed.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Too many documents to comment on in 8 weeks. Suggest use of workshops in future public meetings rather than a Q&A session.

Response:

The documents which were the subject of the consultation were in the public domain from late November 2004. The public consultation period was in excess of the statutory period and this was further extended to take account of comments submitted well beyond the closing date. The consultation process is under review, to improve consultation in the future. Your suggestions on the process are welcomed and will be fully considered. Whilst it is agreed that stakeholder meetings have a role to play in the consultation process it is considered that this approach alone could be viewed as excluding members of the public not affiliated to any organisation.

Action:

Review consultation process.

Dalgety Bay Community Council, Chorleys, Stephen - Dalgety Bay, Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The Plan presents no vision for the future development of Dalgety Bay. Concern that this reflects a view of the town as a dormitory suburb.

Response:

The Plan has not identified Dalgety Bay as a large-scale or medium-scale development area. However, this does not mean it will be ignored and detailed issues will be dealt with in the Area Local Plan.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The Coastal Regeneration Zone (CRZ) should be expanded to include reference to the strategic contribution of Dalgety Bay. The Plan should include an Action Proposal to prepare a comprehensive strategic plan for the CRZ in conjunction with local communities. Suggest that clearer indication be given of how the zone will be developed, to include investment in transport and major business areas, tourist development and retail and social facilities.

Response:

The Key Diagram shows the Dalgety Bay area within the CRZ. However, the Finalised Structure Plan merely provides the framework for the preparation of the detailed strategy (see paragraph 2.3).

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Suggest inclusion of an outline of the strategic role and future development of Dalgety Bay at paras 2.7/2.8, with related amendments to the key diagram.

Response:

The Plan has not identified Dalgety Bay as a strategic land allocation. However, this does not mean it will be ignored in planning for the future and detailed issues will be dealt with in the Area Local Plan. Strategic housing allocations were reviewed in finalising the Structure Plan.

Action:

A number of changes have been made to the strategic housing allocations as detailed in the Finalised Plan.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Welcomes the commitment to development and growth which underpins the Structure Plan.

Response:

Support noted.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: New Forth Crossing

Comment:

Concerned that the future options for the Forth Crossings have not been fully evaluated. Continued planning for growth is considered premature pending evaluation and decisions by the Scottish Executive.

Response:

Concerns noted. The Finalised Structure Plan supports the efficient use of the existing Forth Crossing and in looking forward 20 years must consider the potential requirement for a replacement or additional multi-modal crossing at Queensferry. Further evaluation of options will be taken forward by the Scottish Executive through the agency Transport Scotland and by the South East Scotland Transport Partnership.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Dunfermline

Comment:

In context of cross-Forth traffic, greater strategic weight should be given to promoting existing communities. At Dunfermline this might mean limited organic expansion combined with improved transport linkages. An evaluation should be undertaken of the infrastructure demands on both sides of the Forth as a consequence of the strategic developments proposed, how this will be funded by developers, and whether there will be diversion from improving infrastructure in existing communities.

Response:

The cross-Forth traffic and infrastructure requirement infrastructure and facilities for the proposed new development areas will not be at the expense of meeting requirements for existing communities.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

In addition to the requirements of Draft Plan Policy DC2, health services, social facilities and leisure and recreation facilities should be evaluated.

Response:

The requirements of these services will be considered at the appropriate time when the development is being planned in detail via the Area Local Plan, Master Plans and development briefs. Draft Plan Policy DC2 now Proposal DC1.

Action:

Draft Plan Policy DC2 now Proposal DC1.

Central Dunfermline Community Council, Evans, Valerie - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Dunfermline

Comment:

The area to the south-west of Dunfermline should not be developed as believes that this has been declared as land of special interest and would object to any development on this site . There is also concern that there is no mention of any green belt provision within the proposed western expansion.

Response:

The Green Belt and the areas for development will be delineated taking full account of the landscape and other relevant factors.

Action:

Charlestown, Limekilns and Pattiesmuir Community Council, Hamilton, Sue-Limekilns, Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Growing the population of Fife on such a scale must be predicated upon people working in Edinburgh. Concern that this is to raise council tax revenues and has little to do with sustainability.

Response:

The Structure Plan is by no means an exercise to raise Council Tax income for Fife.

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

The focus on a revitalised city centre for Dunfermline contrasts with Fife Council's past failure to develop the town centre.

Response:

Noted.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Agree that major development should be focussed near public transport interchanges, but there are none in DEX. Concern that Inverkeithing will be unable to maintain its character in the face of increased development. More thought is required for the location of public transport interchanges as Ferrytoll is difficult to access in the morning rush hour.

Response:

The decision to proceed with DEX is set out in the Fife Structure Plan 1994. See Finalised Plan Proposal PT1 for proposals to address DEX. Inverkeithing development would be planned in detail via Local Plan, Master Plans and design briefs to retain character of town. Transport issues fully assessed prior to Draft Plan.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Welcomes the (overdue) insistence on design quality in new developments like Dunfermline Eastern Expansion and Fife Leisure Park. Energy efficiency should be a first priority.

Response:

Welcome noted. Energy efficiency is supported but planning system has little scope to influence except via passive solar design at present.

Action

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

In para 1.27 what is meant by a "full range of facilities"?

Response:

Examples of these would include health care facilities and leisure facilities.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Policy SDA1 is a grand vision but Fife's record of implementation does not inspire confidence.

Response:

Fife Council is committed to working in partnership to deliver the strategy.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

The sequential approach has been in operation for some time. It has done nothing for Dunfermline town centre.

Response:

Sequential approach is only one factor to be considered in planning for future of retail provision. The sequential approach is specified in Scottish Executive guidance (NPPG8). Dunfermline is designated as a sub-regional centre in the Finalised Structure Plan and Policies are supportive of its role and aim to foster regeneration and growth.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

With regard to Draft Plan Policy H4, does "community facilities" mean something like Fife Leisure Park?

Response:

No. In relation to Finalised Plan Policy H3 (Draft Plan Policy H4), community facilities refers to infrastructure and amenities including education, sport and health care facilities, local shops and services, public transport and affordable housing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Support for affordable housing being indistinguishable from other forms, but questions how this will be achieved.

Response:

This is an aspirational aim which is consistent with PAN 74. It is acknowledged that it will not be possible in all cases, but Fife Council wishes to encourage high quality, mixed and integrated development.

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Support for encouraging movement of freight by sea, but concerns that at present coal is off-loaded at Rosyth to be transported to Longannet by road.

Response:

Support and concerns noted.

Action:

No Change

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Density

Comment:

Clarification required as to how the plan will prevent housebuilders focusing on the top end of the market.

Response:

Finalised Plan Policies H2 and H3 (Draft Plan H4) aim to deliver a range of sites and tenures in order to promote mixed and balanced communities. Across Fife, housing sites of 10 units and above will be required to contribute a percentage of their capacity as affordable housing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Suggests that Fife curbs speculative commercial building which has brought limited benefits to the area.

Response:

The Finalised Structure Plan seeks to ensure that all new development is fully planned via Local Plans, Master Plans and development briefs.

Action:

Taylor, Margaret - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Aspiration of 5% growth instead of 1.3% GRO figures need to be justified in greater detail.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, is sustainable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section of demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Building over 400 new houses will change the nature of Tayport village, creating an urban area.

Response:

The housing allocation in the Tay Bridgehead (Tayport, Newport and Wormit) has been revised from 750 to 900 to 500 houses.

Action:

Housing allocation reduced from 750 to 900 to 500 houses.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Agree that there is a need for affordable housing, but this should only meet local demand. Request evidence of this demand, and justification for the Plan's requirement of 45%, when the Scottish Executive recommends 25%.

Response:

Agree in principle, but this is not always feasible or desirable in practice. Not all need can be met locally at the point of origin. Provision must also be made for incoming workers for example. Need is based on the result of the updated Housing Needs and Affordability Study. PAN 74 was published after the Consultative Draft Structure Plan was approved. The percentage requirements for the St Andrews Housing Market Area has been revised in line with PAN 74.

Action:

Revise percentage requirement in Finalised Plan Policy H4 (was H5).

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Given existing transport problems in the area, it is suggested that a proposal for future development must include provision for related infrastructure, including a secondary school.

Response:

It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned. Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

It appears to be the general view in the Tayport area that there is a complete lack of confidence in the whole consultation process and a severe lack of any guarantee that their views will be taken into account.

Response:

Planning legislation requires that comments submitted are given consideration in the Plan preparation process. The Publicity and Consultation Statement must be produced to demonstrate to the Scottish Ministers that the publicity and consultation exercise has been undertaken and to provide a summary of comments and Council's responses.

Action:

Weir, G - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Requests clarification as to why St Andrews needs so much new housing as outlined in Draft Plan Schedule H3, and how this figure has been reached. Further clarification required as to how a 'nil shortfall' in the Fife Structure Plan 2002 has became a requirement for 500 houses by 2011, in contradiction of the 1998 Strategic Study.

Response:

The justification for new development is contained in the Report of Survey. The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Asks how affordable housing can be secured without building more executive housing, and how its long-term affordability can be ensured.

Response:

Affordable housing can be delivered through Housing Associations using Communities Scotland funding. However, this will be insufficient to meet Fife's needs. Whilst a range of non-land use mechanisms will be used, the planning system can make a significant contribution. This is recognised by the Scotlish Executive. Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

Baylis, Wendy - Wormit, Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Suggests that large-scale development proposed for Wormit is in contradiction to para 3.28, which states that land should be allocated for new housing in such a way as to "minimise any adverse impact on the environment". Further suggests that the proposals would result in over-development in rural East Fife (para 3.32) and does not accord with para 4.33 that "on the edge of settlements and in rural areas, development must take account of the identity and distinctive character of the area and respect the landscape setting".

Response:

The development as delineated in Draft Area Local Plan will address all these issues. The Finalised Plan proposals will take 20 years to implement.

Action:

Housing allocation in Tay Bridgehead (Newport, Tayport and Wormit) reduced from 750-950 to 500.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Suggests that development at this location contradicts para 3.46 and the objective 'Guiding new development to locations that reduce the need to travel by private car', and will increase commuting. The roads in and around Wormit are inadequate for the scale of development envisaged.

Response:

Development on the edge of existing settlements has benefits including additional scope for improvements to the public transport services which can contribute to reducing commuting. Roads in the area will be upgraded as necessary to service new development.

Action:

Housing allocation in Tay Bridgehead (Newport, Tayport and Wormit) reduced from 750-950 to 500.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

A rail station at Wormit would not be viable, given that few trains would stop. Wormit is close enough to Leuchars and Dundee to take advantage of their facilities. There is a greater need for a rail station at Edinburgh Airport.

Response:

A rail station, at Wormit would improve travel choice. The Scottish Executive is taking forward the development of a scheme to provide direct access to Edinburgh Airport from the rail network.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Development at Wormit will have a detrimental impact on the A.G.L.V. Concern that this designation is not referred to in the draft Structure Plan. Building on productive agricultural land will detract from the diversity of the rural economy.

Response:

Local landscape designations such as AGLV are under review and may be discontinued. Whilst a great deal of new development can be built on brownfield land, in some locations greenfield land may be required to implement the Plan.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Would like to see the Structure Plan revised so that natural organic growth is allowed, rather than a large expansion as proposed.

Response:

There is a danger that organic growth approach would result in no development. The approach adopted seeks to be proactive and secure the planned development in the planned timescales with the timeous provision of infrastructure and services.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Many of the objectives in the Draft Structure Plan seem to be in direct contradiction of proposals for the Tay Bridgehead area. Indeed the Structure Plan should be radically revised so that no large expansion of the Bridge Head area is proposed, but only a natural organic growth with much smaller areas of land being released for development, gradually over the years. This would not mean stagnation of the village it would mean that residents could retain the quality of rural village life which is presently enjoyed and so greatly valued by its residents.

Response:

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Zomerdijk, Joost - Wormit, Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

There should be a reduced emphasis on national and regional demand as the determining factor in setting the housing land requirement and increased emphasis on other factors, including the local requirement for housing. In view of the environmental impact of proposed housing developments in the Wormit area, alternative sites should be investigated within the settlement boundary in consultation with other councils, particularly Dundee City.

Response:

The calculation of the housing land requirement is set out in the Report of Survey and accords with SPP3 and PAN38. This includes consideration of both local need and inward migration, with indigenous household change accounting for the majority of the requirement.

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan.

The detailed identification of housing sites at Wormit is more properly addressed by the St Andrews & East Fife Local Plan and will be considered in this context.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

While affordable housing for local employees may be needed, the scale proposed exceeds the requirement in the Tay Bridgehead area.

Response:

The percentage requirement for the St Andrews Housing Market Area, in which the Tay Bridgehead area is located, has been revised in the Finalised Structure Plan. The level of need has been derived from the updated Housing Needs and Affordability Study.

Action

Revise percentage requirement in Finalised Plan Policy H4 (was H5).

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Object to the scale of development proposed. It is disproportionately large compared to the current community and would promote commuting.

Response:

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Dear, Douglas - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Concern that proposals in the area are an early move to facilitate the Dundee City Region proposals and will create a dormitory for Dundee. This is unsustainable.

Response:

Disagree. Housing need figures calculated by Fife Council using Scottish Executive specified methods.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

The development of small urban sites and brownfield sites, which can be integrated and use existing infrastructure, is to be encouraged.

Response:

The Structure Plan strategy promotes the use of the sites within urban areas, especially brownfield sites, which can be serviced.

Action:

Clark, A - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Objects to scale of development proposed. Provision is not made for the provision of infrastructure, such as roads, schools, health care.

Response:

Objection noted. It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned. Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Wilson, A W - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

General concern regarding the need for such a large housing development and the lack of supporting infrastructure.

Response:

It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

St Andrews proposal is preposterous and any development should be halted until all the following are additionally redressed satisfactorily and in place before the house building starts except that for affordable housing. The list includes improved roads, light rail up and running around St Andrews and a rail station. If Guardbridge and Leuchars are to be satellite settlements then a light railway/tram system is an essential prerequisite before house building starts. Healthcare needs to be increased to cope with the additional needs.

Response:

It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Public Transport

Comment:

Draft Plan Policy T4 is fine but, for instance, the coastal path is not maintained satisfactorily. Would it not be better to raise the quality and standard of the present route before thinking of extending it? The multi-modal Forth crossing is used to fill out the text. A timetable should be included in plans for action.

Response:

Support for Draft Plan T4, now Finalised Plan Policy T2, noted. Path maintenance is not a strategic planning issue. See the Action Plan document for information on implementing the Structure Plan.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Support the policy objectives but there is little mention of using new technology for electricity regeneration. What about a wind driven generator in every building, the use of solar panels, fuel cells, wave generators? Suggests St Andrews University should be in partnership with industry in terms of research and development in Glenrothes. Provides various examples of transportation run on renewable energy. Fife should be leading the country in terms of the production of green energy.

Response:

Renewable technologies yield energy for use in a number of forms, including the generation of electricity. A range of technologies is mentioned. Paragraph 3.62 of the Finalised Structure Plan states support for, and encouragement of, the use of renewable energy.

Action:

Harkins, William - Wormit, Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Questions the timing of the publication of the St Andrews and East Fife Local Plan and suggests that the problems of Mid Fife should be addressed before creating additional housing in north-east Fife.

Response:

Concerns noted. It was considered that there are benefits in allowing people to see the detailed proposals in the Local Plan which implements the Structure Plan guidance.

Action:

Review consultation process.

White, John & Audrey - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Object to the housing development proposed as it would add to already congested roads and exacerbate problems of primary school provision and access to health care. Questions whether the proposals were taken into account in relation to the new WWTW.

Response:

Objection noted. It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned. A whole range of services including water and drainage taken into account.

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Osmon, G - Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The reasoning behind the Council's proposals for the Tay Bridgehead are appear ill-conceived and inadequately investigated, with a lack of figures to substantiate it.

Response:

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Disagree with the Council's arguments for the proposals and feel that local community needs were not properly considered. The public meeting did not convince of the need for further developments on this site.

Response:

The numbers have been reviewed and the Finalise Plan reduces the allocation from 750 to 900 to 500 houses. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

Allocation from 750 to 900 to 500 houses.

Crockhart, V - Wormit, Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Insufficient detailed information was provided at the Newport-on-Tay meeting on 12th April.

Response:

The public meeting was not intended to provide all the information. Copies of the consultation documents were available in a number of locations in the Tay Bridgehead area and freely available on the Fife Direct website.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Seeks clarification of what is "affordable housing" and how much it costs.

Response:

The definition of affordable housing used in the Finalised Structure Plan and Supplementary Guidance on Affordable Housing is consistent with that contained in SPP3 and PAN74. It is a broad definition which covers a range of tenures. With regard to low cost housing for sale, affordability varies according to income and house prices. The Implementation Guide sets out target house prices.

Action:

Blair, Andrew - Wormit, Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Too many houses are planned for Wormit. Infrastructure is not there to support the additional houses proposed. Brownfield sites should be used before encroaching on farmland. 10% additional housing for a village of the size of Wormit is more than enough without changing the character of the village. If so many houses are required then perhaps a new village with the infrastructure in place should be built.

Response:

Noted. The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Brown, M M - Wormit, Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Further housing in Wormit is not supported. Infrastructure is needed, including a new secondary school and road improvements.

Response:

Opposition to new housing in Wormit noted. The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Affordable housing should be for local people - tenants should not come from Kirkcaldy and St Andrews etc.

Response:

This is not a strategic land use planning issue. However, it is addressed in the Implementation Guide for Affordable Housing produced by the Council's Housing Service. This includes applicants with a local connection. It is not feasible to offer affordable housing only to those with a local connection. However, some provision must be made for incoming workers, for example. It is Fife Council and the Scottish Executive's policy that whenever possible, need for affordable housing should be met in the same housing market area in which it arises.

Action:

No action required.

McLaren, M - Wormit, Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

More housing in Wormit is not supported and would exacerbate traffic congestion.

Response:

Opposition noted. It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned. The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Suggest provision of some smaller houses to allow retired people to downsize and make family homes available.

Response:

Suggestion noted. The Development Plan cannot prescribe the type of housing which is built, this is for the development industry to determine. However, Structure Plan and Local Plan policy provides strong support for the provision of a range of site and tenures in order to promote mixed and balanced communities.

Action:

Thompson, S - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Infrastructure

Comment:

The Structure Plan contains no consideration of services in Tayport, including provision for the elderly, a new secondary school or the utility services and the requirements for health care facilities.

Response:

Fife Council has been in dialogue with all the service providers prior to preparing the Draft Plan. Information on infrastructure and service needs/provision are set out in the Action Plan.

Action:

No Change

ID 0156

Sawyer, Jean - Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

There are many people in the Tay Bridgehead area who would welcome affordable housing.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

A more effective chair at the Newport public meeting would have allowed a range of viewpoints to have been heard, rather than a focus only on affordable housing.

Response:

Chairs must try to strike a balance allowing people to have their say and avoid them feeling that they are being "silenced" if they take too long.

Action:

Crockhart, David - Wormit, Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Suggests ideas for facilitating a better understanding of the Development Plan, such as a seminar with community representatives and elected representatives to discuss all development matters in detail. The Newport-on-Tay meeting did not give sufficient detailed information.

Response:

Suggestion noted. However, the approach must not make people who attend a public meeting feel that they have no role to play. Public meetings cannot provide all the information in such a short time and the documents were freely available in the Newport area and on the Fife Direct website.

Action:

Review consultation process.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Before development takes place in the Tay Bridgehead area, infrastructure improvements should be in place, including public transport, water and sewerage, leisure facilities and education.

Response:

Finalised Plan Policies DC1 and H3 (Draft Plan H4) provide support for the full consideration of infrastructure requirements prior to development commencing. Detailed issues relating to the Tay Bridgehead area are considered in the St Andrews & East Fife

Local Plan.

Action:

Richmond, Mary - Wormit, Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is unclear why Fife Council is proposing significant greenfield housing development in North East Fife when Scotland's population is in decline. Lack of local employment will result in commuting and congestion. There is inadequate infrastructure to support further development.

Response:

The numbers have been reviewed and are included finalised in the Finalised Plan Proposal H2. The delineation of development areas in the Draft Area Local Plan has taken full account of the landscape and other service issues. It is planned that infrastructure and services will be provided to service new development.

Action:

A number of changes have been made to the strategic housing allocations as detailed in the Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

There is no clear information on the type of housing proposed, in particular housing suitable for the elderly. Many elderly people do not necessarily require special provision such as sheltered housing.

Response:

The Structure Plan identifies the broad amount and location of new housing land, with Area Local Plans addressing specific site allocations and local needs. Finalised Plan Policy H2 (Draft Plan Policy H3) directs Local Plans to identify sites for development including for special needs housing and a range of sites, tenures and house types in each Local Plan Area.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Concern that when new housing is under construction, the traffic generated will be excessive.

There is also concern that this may reduce safe areas for children to play.

Response:

It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned. Master Plans and/or design briefs should ensure that an adequate provision of safe play areas will be provided.

Action:

Thompson, S - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

The Structure Plan appears to be solely about housing. Infilling of sites without thought to context or effect will destroy open spaces and the character of Tayport.

Response:

Structure Plan address the whole spectrum of future development for the period of 2006-2026. Detailed land use proposals are contained in the draft Area Local Plan and site selection process has taken full account of open space requirements.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

The setting of Tayport is adversely affected by hilltop development. The proposed development is excessive and suggests that executive housing will claim the best sites. Suggests development more acceptable lower down the hill. There is no provision for attracting new business to Tayport if all brownfield sites are allocated for housing.

Response:

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. The Area Local Plan ensures that there is provision for appropriate level of provision of land for employment generating purposes.

Action:

Wainman, Anna - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

There is no need for further housing in Tayport. The increase in traffic would be unacceptable and infrastructure improvements are needed to serve the existing community.

Response:

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. It is planned that infrastructure and services will be provided to service new development.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

It is considered that the Spearshill area has only been chosen as a site as it will be attractive to developers due to its elevated position overlooking the Tay. The development of this area will result in a greatly used passive recreational area which greatly adds to the amenity of the area.

Response:

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. The Master Plan/development brief for the area will make provision for open space and pedestrian access through the area to be developed.

Action:

Roberts, Andrew - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The infrastructure in the Tay Bridgehead area, particularly Tayport, is inadequate for the planned increase in housing. Given that most inhabitants of the development would work in Dundee, congestion would increase at the Tay Road Bridge. This contradicts para 3.37 "...that no settlement incurs a rate and scale of development that the local infrastructure cannot support."

Response:

Finalised Plan Policies DC1 and H3 (Draft Plan H4) provide support for the full consideration of infrastructure requirements prior to development commencing. The delineation of development areas in the draft Area Local Plan has taken account of infrastructure issues.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

As the Bridgehead area houses many people who work in Dundee, it would be more appropriate for any new housing requires to be on brownfield sites in the city. This would accord with para 3.37 in favouring brownfield development.

Response:

The planning strategies of Fife and the neighbouring Councils has been to meet the housing and development needs of their respective areas, particularly in relation to housing, so that unnecessary commuter traffic is discouraged.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Any additional housing in Tayport should not be considered without a definitive plan for the provision of a new primary school.

Response:

It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time in support of development. Finalised Plan Policies SS1, DC1 and C1 and Proposal DC1 provide policy guidance. Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

The open space at Spearshill is a valuable public amenity and crucial to the character of the town of Tayport, which would be destroyed by any proposed housing. This is contrary to the policy objectives and para 4.24 "safeguarding and improving the character and distinctiveness of Fife's landscape and coastline, including landscape settings of towns and villages."

Response:

The numbers have been reviewed and confirmed in the Finalised Structure Plan. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. The Master Plan/development brief for the area will make provision for open space and pedestrian access through the area to be developed.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

The proposed area for housing in Tayport would create significant extra traffic on narrow, steep roads down to the town centre. Reference is made to Draft Plan Policy T1, which refers to the need to not create or exacerbate a road safety problem.

Response:

It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

Kilmister, Sally - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Proposals for housing in Tayport are inappropriate and unsustainable. If a much-reduced number of houses were planned, would seek immediate and full funding for a sports and community centre in Tayport.

Response:

The infrastructure and associate facilities required for new development in the Tayport area will be identified in the Finalised St Andrews and East Local Plan implementing the revised housing allocation of 500 houses as set out in Finalised Plan Proposal H2.

Action:

O'Neill, Basil - Wormit, Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Supports proposals to retain East Fife's status as a rural area.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Some commercial development is needed in East Fife, to create employment and reduce commuting.

Response:

Noted. Finalised Plan, in conjunction with other documents and implementing agencies, seeks to create the conditions to bring more job opportunities to East Fife.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Proposes development in Cupar to generate local employment and provide some housing, which in turn would support local services and infrastructure.

Response:

Support noted. Cupar is identified in Finalised Structure Plan as a Strategic Development Area. A further 1,450 new houses are proposed at Cupar over the next 20 years, with 1,200 being on greenfield land to the north of the town to facilitate a relief road. This allocation of 1,450 new houses is an increase from the consultative draft Plan, which identified 600 – 1,000 houses over the same period. This change has been made in response to the comments received on the consultative draft Structure Plan together with the need to provide a relief road and affordable housing in the town.

Action:

Housing allocation increased from 600–1,000 to 1,450 in finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Concentrating development in Cupar would reduce the housing requirements for other parts of East Fife and prevent damage to the rural environment and landscape value.

Response:

Cupar is identified in Finalised Structure Plan as a Strategic Development Area. A further 1,450 new houses are proposed at Cupar over the next 20 years, with 1,200 being on greenfield land to the north of the town to facilitate a relief road. This allocation of 1,450 new houses is an increase from the consultative draft Plan, which identified 600 - 1,000 houses over the same period. This change has been made in response to the comments received on the consultative draft Structure Plan together with the need to provide a relief road and affordable housing in the town.

Action:

Housing allocation increased from 600–1,000 to 1,450 in finalised Plan.

Kennedy, Elizabeth - Wormit, Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Despite reassurance about the openness and transparency of the process, the Newport public meeting reflected the feeling that the public have not been properly engaged or consulted.

Response:

Concerns noted. The consultation process is reviewed after each exercise to evaluate whether it can be improved and other mechanisms will be tried in future in an attempt to address concerns raised.

Action:

Review consultation process.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

With the fall noted in Scotland's population, is it necessary to "grow Fife"?

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projections of 9.1% growth, are realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section of demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Accepts need for affordable housing if well-controlled and managed. Concern that there are no guidelines regarding allocation of housing, the proportion of different types of affordable housing or where it would be available.

Response:

Support in principle noted. The Implementation Guide produced by Fife Council's Housing Service contains guidelines on the allocation of housing and type of housing required. Generally, 65% will be social rented. Inevitably however, the availability of public subsidy will be a significant factor in determining tenure.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Concern that the proposal put forward advocates the housing development in advance of the provision of public transport and there is insufficient information about how the extra car traffic generated will be managed.

Response:

It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

The settlements in the Tay Bridgehead area are sustainable communities and do not require to be altered. Whilst the Structure Plan mentions the sensitive growth and development in the rural economy, concerned that the proposals to develop a large number of houses in the Tay Bridgehead area are an insensitive solution.

Response:

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other issues.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

The Tay Bridgehead is a commuter area for Dundee and St Andrews, operating as one economy. There are few disparities in the area and no obvious need for economic growth. People choose to live and work at separate locations, so should not provide new housing where jobs do not exist - Wormit needs new housing and economic growth.

Response:

Housing need figures are calculated by Fife Council using Scottish Executive specified methods to meet needs of Fife. Provision of land for employment generation purposes in the area will be achieved via the Area Local Plan process.

Action:

Dykes, Andrew - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Para 1.29 states "the strategy to safeguard and improve Fife's environment is to protect and enhance the character and distinctiveness of Fife's towns and villages". The scale of development proposed for Tayport contradicts this statement.

Response:

Disagree. The approach to implementing the development planned via the Area Local Plan, Master Plans and development briefs will ensure the character and distinctiveness is retained.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Policy SS1 supports a strategic framework for local planning and the assessment of development proposals, with regard to retaining and improving the landscape setting of settlements. Tayport should be allowed to retain its landscape setting.

Response:

The approach to implementing the development planned for the area via the Area Local Plan has/will take full account of the landscape setting.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Proposed development would remove a local path and informal recreation at Spearshill Field. This contradicts Plan objectives for safeguarding and improving Fife's environment.

Response:

Master Plans and development briefs would ensure that any new development featured open space and routes for pedestrian access through the area.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Draft Plan does not justify or demonstrate the stated housing needs, nor justify the various percentage requirements for affordable housing. Proposes that the Plan be redrafted to include the figures/analysis of Local Housing Needs, and the requirements for Affordable Housing broken down to reflect local needs.

Response:

The Finalised Structure Plan, Report of Survey and Supplementary Guidance demonstrate and justify the percentage requirements for affordable housing in more detail. These are informed by the updated Housing Needs and Affordability Study. The Study itself provides figures at various geographical levels.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Mismatch of household and dwelling is the largest factor in housing need in Fife. Some new build is needed, but a major redevelopment of housing stock would help to satisfy demand, rather than large-scale new build.

Response:

Disagree. The approach of meeting the need for new affordable housing is based on the result of the updated Housing Needs and Affordability Study. Whilst a mismatch of households and dwellings is a significant factor in Mid Fife, there is a need for approximately 5,000 new affordable houses in Fife. Fife Council is however also taking steps to refurbish existing Council housing stock.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Will the population in Mid Fife be at current levels in 2026? Also questions how developers will be persuaded to build 14,000 houses there, how many residents will be employed in Mid Fife or commute, and where and how many houses will be empty or demolished.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

The proposals for Tayport contradict Draft Plan Policy T1 and will increase traffic through the town and the number of children walking to school.

Response:

It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned. It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned. Current thinking seeks to encourage children to walk to school and to provide safe routes to facilitate this.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Over-supply of housing will decrease confidence in the housing market, reducing house prices in Mid Fife.

Response:

Disagree that the Structure Plan proposals will have the adverse effect suggested.

Action:

No Change

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The Draft Plan should be redrafted to address the true housing needs for Fife - new small-scale, quality affordable housing.

Response:

The approach to meeting the need for affordable housing through the planning system is based on the results of the updated Housing Needs and Affordability Study. As far as is practicable, provision of affordable housing will reflect local needs. This will involve a range of tenures, sites and locations. Not all need can be addressed through small scale development.

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Existing affordable housing should be restricted to provide a mix that matches demand rather than over-supply, and allow for organic growth in the private sector through small scale developments.

Response:

Noted. Retention of affordable housing is an important issue, which is being actively pursued and is addressed in Supplementary Guidance and the Finalised Structure Plan. The detail of site selection for Tayport is addressed through the St Andrews and East Fife Local Plan.

Action:

Tayport Local Plan Action Group, Stevenson, Fionn - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

There is no overall justification for the decision to increase Fife's population over 20 Years primarily through an "over-allocation of housing requirements" (para 1.12).

Response:

The Finalised Structure Plan takes a pro-active approach to address the economy of Fife and it is considered that growing the population has a significant part to play in implementing the strategy.

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

There are contradictions in the strategic decisions about where to provide housing in the Tay Bridgehead area in relation to sustainability principals on reducing energy use, pollution and transportation impacts, and in relation to the principle of mixed developments supported by local employment opportunities.

Response:

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

There is no justification for the increase in housing proposed in the Tay Bridgehead area, specifically Tayport, in terms of genuine local housing need. Not against new housing providing the numbers are properly justified in terms of planning policy related to infrastructure, etc.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

The proposal for Tayport is not justified in terms of environmental impact, physical and community infrastructure and facilities and threatens the town's quality of life. Proposal contradicts Draft Plan Policy H3, that sites will be preferred which are close to employment opportunities, and will increase commuting to Dundee and St Andrews.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. The Area Local Pan will provide land for employment purposes in the area to provide for new job opportunities. Housing allocation for Tay Bridgehead area reduced from 750-950 to 500 in the Finalised Plan.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Justification required for figures in Policy SS1 and the disparity between these and the figures in the previous Structure Plan at a time of decreasing population in Scotland.

Response:

Comment refers to Schedule S1. There have been significant changes in population since the preparation of the Adopted Structure Plan, such as growth in household formation and inward migration. An ongoing reduction in household size, as detailed in the Report of Survey, is the main driver for new housing, as there are fewer people per household in existing housing stock.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Would like to see the total number of houses allowed for each town and village, set out in a summary table and set against planned population expansion targets for the same.

Response:

The Structure Plan provides strategic land use policy, setting the housing land requirement and giving an indication of the location and approximate scale of strategic land allocations. It is for Area Local Plans to determine the location of development sites and the detail of proposals on a settlement basis. Information on population and demographics is contained within the Report of Survey.

Action:

Wake, John - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

The proposals appear to be based on national, Scottish and regional projections of demographic changes and housing need, with no evidence presented that Fife matches these predicted trends. Lack of data that demonstrates the trend towards single occupancy is happening in Tayport and surroundings. Suggests that new housing will not be for local people.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth. The provision of housing planned for 2006-2026 is aimed at meeting locally generated needs over the period.

Action:

No change in planning for 5% growth.

McLaren, R - Wormit, Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

The basic growth target of 5% as proposed in the Structure Plan is not supported. The Structure Plan should relate to the normal expected population growth rate which is expected to be 1.7% over the next 20 years. The need for so much new housing development as proposed in the new Structure Plan is questioned.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Development in the Tay Bridgehead area, which is mainly a commuter village for Dundee, is unlikely to help the focus on Mid Fife, but will exacerbate problems in Wormit and Tayport and place additional pressure on the Tay Road Bridge. The development is not medium sized in relative terms and an alternative of developing brownfield sites in nearby Dundee should be considered. In addition, the proposed development is unlikely to be successfully accommodated in the existing landscape.

Response:

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other issues. Housing need figures are calculated using methods specified by the Scottish Executive.

Action:

Smith, Terry - Wormit, Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Objective of stabilising and even increasing the population in Mid Fife is laudable, but cannot be applied to Newport and Wormit where there is an indication of population or environmental decline, and contradicts Policy SS1 and para 3.32. Development would also increase the burden on already strained infrastructure.

Response:

Support for stabilising and growing population in Mid Fife noted. The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Proposal for 40-45% affordable housing is in excess of government targets and not justified by para 3.38 which states that affordable housing "will be sought in these areas where there is a demonstrated need". There has not been a need demonstrated to this level, which would change the character of Wormit and result in take-up of housing by households from outwith the area rather than serving local need.

Response:

The Scottish Executive did not publish PAN 74 until after the Consultative Draft Structure Plan was approved. The finalised Structure Plan and Supplementary Guidance on Affordable Housing now take this new advice into account. The percentage requirement for the St Andrews housing market area, which includes the Tay Bridgehead area, has been revised to 30%. The aim of the Structure Plan is to meet the need for affordable housing market area in which it originates although this is not feasible in every instance e.g. that for incoming workers.

Action:

Change percentage requirement in Finalised Plan Policy H4 (was H5).

Romilly, Sally - Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Questions the need for the number of houses proposed in north-east Fife. Concerns about housing quality and need to promote sustainable development - there is an opportunity to incorporate new technologies. Existing infrastructure cannot cope with large-scale development.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other issues. Housing need figures are calculated to meet Fife needs using methods specified by the Scottish Executive.

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan.

Action:

Campbell, David - Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Brownfield Land

Comment:

Suggests that the description of "appropriate brownfield land" in para 1.29 is clearly defined and clarified.

Response:

Strategy for development is set out in Policies SS1 and SDA1. The acceptability of brownfield sites for development should also be evaluated against Finalised Plan Policy BL1 and indeed other Development Plan policies.

Action:

Draft Plan Policy ENV2 now renamed Policy BL1 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Suggests that para 3.17 and "need to maintain and build sustainable communities" is at odds with proposals for Newport such as large-scale housing developments and a park and ride.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other issues. Housing need figures are calculated to meet Fife needs using methods specified by the Scottish Executive.

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan.

Action:

Neilson, I - Wormit, Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Development proposals will exacerbate existing traffic congestion and impact on quality of life. Provision of further infrastructure is essential to any development proposal, with existing deficiencies in education, health services and public transport, and should be invested in before further development goes ahead.

Response:

It is intended that the additional infrastructure and services required will be in place to service new development.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Support for a rail halt at Wormit, together with parking provision adjacent to the station. Questions need for a park and ride at the Tay Bridgehead as most people travelling to Dundee are not heading for the city centre.

Response:

Support noted. A Park and Ride at the Tay Bridgehead will increase travel choices.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

New housing should be made available to local people.

Response:

This is not a land use planning issue. The allocation of Affordable Housing is addressed by the Implementation Guide on affordable housing being produced by Fife Council's Housing Service. Priority will be given to those households with local connections but not exclusively so. Provision must also be made for other groups, e.g. incoming workers.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Figure of 45% for the St Andrews housing market area is too high.

Response:

The percentage requirement for the St Andrews housing market area has been reviewed in line with PAN 74 and the updated Housing Needs and Affordability Study. It is now 30%.

Action:

Change percentage requirement in Finalised Plan Policy H4 (was H5).

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Concern that police infrastructure will not cope with increased workload created by proposed development.

Response:

It is intended that the additional infrastructure and services required will be in place to service new development.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Tourism

Comment:

Concern that over-development will detract from Fife's existing tourist attractions.

Response:

The impact on tourism has been/will be fully considered in relation to Development Plan proposals and any emerging planning applications.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Infrastructure

Comment:

Any increase in population will inevitably bring social problems. The local police have a tough enough job on their hands at present. Will extra police be employed in the future?

Response:

It is intended that the issues relating to crime will be addressed and good design will ensure that it is not a concern in the newly developed areas. The issue on the numbers of police staff who will be employed in the future as an issue for the Fife Constabulary who have been consulted as part of the preparation of the Structure Plan.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Tourism

Comment:

Tourism is a life-line for many parts of Fife, but the danger lies in "killing the golden goose", the existing attractions in Fife are what bring people to the Kingdom. To radically alter the beauty of the region, by whatever kind of development, will ultimately drive visits away and this has been the experience elsewhere. Even now, over development in the East Neuk has damaged the charm of the location. There is concern that the increased development in the Tay Bridge area and in the St. Andrews area will have a similar detrimental effect on the tourism industry.

Response:

The importance of tourism to Fife is acknowledged. It is intended that any new development will be sympathetic to, and in harmony with, Fife's sense of place thereby preventing any adverse impact on the tourism industry.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The proposed development in a number of areas including the Tay Bridge area appears to run contrary with the strategy with regards to protecting and enhancing the varied natural and built heritage of Fife as stated in the structure plan. It is considered that the structure plan will not result in the stated vision of Fife being a location of first choice in East Central Scotland as attractive place with thriving and sustainable communities. It is considered that the plan is in desperate need of total reconsideration, if not scrapping entirely, as it seems to be creating problems rather than solving them.

Response:

Disagree. The proposed development is required to meet needs identified for the 20 year period. The proposals, delineated in the Area Local Plan, include the provision of land for employment generating purposes. Strategic housing allocations have been given further consideration in finalising the Structure Plan.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan in the Tay Bridgehead.

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Requests definition of "affordable", and that such housing is designed to fit in with local architecture.

Response:

Definition of "affordable housing" is contained within the Plan's glossary. Wherever possible new housing should blend in as far as possible with surrounding development.

Action:

No Change

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Suggests that issue of holiday homes is tackled, to fulfil a local housing need instead of further housing development. The use of brownfield sites and use of empty properties should also be investigated.

Response:

Fife Council does promote the use of suitable brownfield sites for new housing and the re-use of empty properties. However, there is still a need for new housing on greenfield sites.

Action:

Ross, Birgit - Wormit, Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Unhappy at the inadequate time allowed for consideration of the range of consultation documents.

Response:

The documents were in the public domain from late November 2004. The formal consultation period was in excess of a statutory requirements and additional time was provided for those who requested an extension and, in the event, all responses were accepted up to three weeks beyond the final date. The consultation process is under review to improve consultations in the future.

Action:

Review consultation process.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Agree that affordable housing should be made available, but 45% is excessive.

Response:

Support in principle noted. The percentage requirement for the St Andrews housing market area has been reviewed in line with PAN 74 and the updated Housing Needs and Affordability Study. It is now 30%.

Action:

Change percentage requirement in Finalised Plan Policy H4 (was H5).

Johnson, N - Wormit, Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Proposals for new residential development in the Draft Plan contradict the objective in the adopted Structure Plan to constrain migration-led housing development. Suggests that development proposals are to justify the development of a secondary school.

Response:

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other issues. Housing need figures are calculated by Fife Council using Scottish Executive specified methods. Proposed development is not driven by potential gains.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Questions use of 40% requirement when the Scottish Executive suggests 25%, and where the demand is coming from for such a figure.

Response:

The percentage requirements have been amended to take account of PAN 74 on affordable housing issued by the Scottish Executive.

Action

Change percentage requirement in Finalised Plan Policy H4 (was H5).

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Suggests that proposals for residential development which will lead to increased commuting are unsustainable and do not satisfy the criteria in SPP3 that residents "should not be dependant solely or mainly on car access". Further suggests that developments at this location does not accord with NPPG17 in reducing the need to travel.

Response:

Increased numbers of houses in the area is likely to make the provision of improved public transport services more viable. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other issues.

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Suggests that the Tay Estuary Rail Study Report, May 2003, provides no support for a rail halt at Wormit.

Response:

Wormit proposals endorsed by Scottish Executive in approving the Fife Structure Plan 2002.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

In relation to extension to existing towns and villages, SPP3 states that residents should not be dependent solely or mainly on car access. How do the proposals in the Tay Bridgehead area satisfy this criteria as they appear to encourage commuting? Development of the scale proposed will lead to increased commuting which will lead to increased commuters and pressure and congestion on the Tay Road Bridge.

Response:

The provision of land for employment generating purposes should assist in servicing local employment opportunities in Fife. Proposals for enhanced public transport is also set out in the Plan, including a park and ride facility.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Requests clarification of the mechanisms intended to ensure that affordable housing is satisfying local needs.

Response:

A very detailed and thorough assessment (Fife Housing Needs and Affordability Study) has been undertaken to identity the actual need for affordable housing.

Action:

Gray, B T - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

There is no justification for significant development at this location, which would increase traffic flow and impact on local infrastructure.

Response:

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other issues.

Action:

Moulds, Caroline - Wormit, Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Objects to proposed development in Wormit and Newport.

Response:

Objection noted. The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Considers that affordable housing will be detrimental to the Newport/Wormit area in respect of house prices and design.

Response:

The need for affordable housing in the Tay Bridgehead area has been established and quantified by the Housing Need and Affordability Study. The policy objective is to meet locally arising needs as locally as possible. Fife Council and the Scottish Executive support the principle of mixed, diverse and balanced communities. Good design quality will be actively promoted through use of the Fife Urban Design Guide.

Action:

Moulds, Jacqueline - Wormit, Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Objects to proposed development in Wormit and Newport.

Response:

Objection noted. The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Considers that affordable housing will be detrimental to the Newport/Wormit area in respect of house prices and design.

Response:

The need for affordable housing in the Tay Bridgehead area has been established and quantified by the Housing Needs and Affordability Study. The policy objective is to meet locally arising needs as locally as possible. Fife Council and the Scottish Executive support the principle of mixed, diverse and balanced communities. Good design quality will be actively promoted through use of the Fife Urban Design Guide.

Action:

Moulds, Alan - Wormit, Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Objects to proposed development in Wormit and Newport.

Response:

Objection noted. The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Considers that affordable housing will be detrimental to the Newport/Wormit area in respect of house prices and design.

Response:

The need for affordable housing in the Tay Bridgehead area has been established and quantified by the Housing Needs and Affordability Study. The policy objective is to meet locally arising needs as locally as possible. Fife Council and the Scottish Executive support the principle of mixed, diverse and balanced communities. Good design quality will be actively promoted through use of the Fife Urban Design Guide.

Action:

Gordon, lan - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Objects to the housing proposals for Tayport, with infrastructure neither in place nor capable of being provided. Roads are inadequate and public transport will not meet demand.

Response:

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other issues.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Questions the proposal to re-open Wormit Station and suggests is not a realistic option due to cost. Concern at proposed location of Newport park-and-ride facility.

Response:

Wormit proposals endorsed by Scottish Executive in approving the Fife Structure Plan 2002. Concern about Newport proposals noted. The detail of a site for a Park and Ride facility in Newport will be addressed through the Area Local Plan.

Action:

McLaren, Gordon - Wormit, Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: City Region Planning

Comment:

Agrees with Preface para 5, that planning authorities should work with neighbouring authorities in planning for housing, the environment, transport and jobs. Suggests that for the St Andrews and East Fife Local Plan, Dundee has a key role and the Finalised Plan should include the view of Dundee City Council and how they will work together to implement the Plan's proposals.

Response:

Support for Preface paragraph 5 noted. Fife Council liaises with Dundee City Council on strategic planning matters and the proposed scale of development is considered appropriate to meet projected requirements for the Plan period to 2026. Views of Dundee City Council have been considered in Finalising the Structure Plan.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

The Vision in para 1.2 needs to be set against the overall projections for Scotland from the General Registrar for Scotland. The figure of 370,000 is too ambitious and should be revised to a more realistic level. Seeks justification for such an aspirational strategy, which does not focus sufficiently on Mid Fife. The final strategy statements are not adequate justification and the Plan does not set out what the natural projected growth rate would be and how the proposal differs from that.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Asks for clarification of the growth rate for East and West Fife, given that Mid Fife will stand still. Suggests that the former must be much higher than 5% at the expense of Mid Fife and questions how the latter fits with the need to focus the entire Plan on regenerating Mid Fife (para 1.7). Explanation needed of how this aspirational growth approach will regenerate Mid Fife and where these people will come from.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

The strategy seeks to concentrate efforts on addressing the problems of Mid Fife which are indicated by various indicators. It is anticipated that initially many of those moving to Fife to meet the population growth will commute to Edinburgh and the Lothians via an improved public transport system before taking advantage of locally generated employment.

Action:

No change in planning for 5% growth.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Supports the Plan's focus on Mid Fife and strategy outlined in para 1.16. Concern that over-exploitation of St Andrews could kill off its tourist attractions.

Response:

Support for strategy of focussing on Mid Fife and concern about St Andrews noted.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Support for paras 1.17-1.19 and proposals for increased connectivity. Proposes inclusion of a bullet point "To discourage unnecessary commuter car trips across the Tay Bridge". The idea of park-and-ride schemes across the Tay needs testing and may only have a minimal impact.

Response:

Support for increased connectivity noted. The strategy of the Finalised Plan seeks to reduce unnecessary commuting. Park-and-ride schemes in the Forth Bridgehead have proved successful therefore no reason they should not be so in Tay Bridgehead.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Does not see how growing the population of East and West Fife and having a static Mid Fife will promote economic and regeneration in Mid Fife (1st bullet, para 3.32). Further explanation is required.

Response:

Whilst the Structure Plan strategy is to attract people to Mid Fife, the Plan cannot ignore the needs of East and West Fife for the Plan period 2006-2026. It is intended that the location of the growth areas in close proximity to the existing public transport network would facilitate community via an improving public transport network. In addition the provision of employment land and other actions are intended to create employment in these areas as a counter attraction to commuting out of Fife for employment.

Action:

Demographics work has been updated, the details of which are contained in the Report of Survey.

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Support for the prevention of over-development in rural East Fife and for housing allocations to minimise any adverse impact on the environment.

Response:

Support noted.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The housing allocations following from para 3.33 are not supported and are over-inflated. There should be more focus on Mid Fife. Local Plan allocations outlined in para 3.35 should not only focus land releases on the areas identified, but should allow for a small amount of new development in most hamlets and small villages.

Response:

Noted. The Structure Plan Strategy gives a strong focus to Mid Fife, while allowing for some growth in West and East Fife to meet local needs and support the Fife economy. Area Local Plans will identify the balance of development not allocated in Finalised Plan Proposal H2, providing for a range of sites and tenures in each Local Plan Area.

Action:

No Change

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Supports Policy H5, but the proportion is too high for new development in East Fife. This should be nearer to 25%, consistent with Scottish Executive guidance.

Response:

Support in principle noted. PAN 74 was published after the Consultative Draft Structure Plan was approved. It has been taken into account in the Finalised Structure Plan and Supplementary Guidance. Percentage requirements for the St Andrews and Cupar housing market areas have been reviewed.

Action:

Change percentage requirements in Finalised Plan Policy H4 (was H5).

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

More facts and figures should have been provided at the public meetings, rather than expecting people to access the documents on the internet or the local library for detail.

Response:

It is almost impossible to provide the wealth of information it is suggested should be available at a public meeting. More information would have been supplied had it been requested and if it was available.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The local plan allocation should not only focus land releases in the Tay Bridgehead and other areas mentioned. If they are required, there should be a small amount of new development in most hamlets and small villages to prevent only a few communities bearing the brunt. Many villages have in the end had little or no proposals in the Local Plan and this is presumably in part due to the statement in the Structure Plan.

Response:

The Structure Plan identifies the broad amount and location of new housing land. It is for Area Local Plans to identify specific sites for development, in consultation with local communities, landowners and stakeholders.

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Comment No: 13

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

It is considered that the public meetings and in particular the meeting of 25th April at Blyth Hall in Wormit did not provide more facts and figures in order to assist the people to prepare responses to the plans. It is not considered helpful to merely advise people where they could gain access to the consultation documents.

Response:

It is almost impossible to provide the wealth of information it is suggested should be available at a public meeting. More information would have been supplied had it been requested and if it was available.

Action:

Dallas-Ross, Sarah - Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Questions why, if the focus of new housing is Mid Fife, so many houses are to built in St Andrews and East Fife, particularly in the Tay Bridgehead. Does not think that this is an appropriate area to build so many houses, as it will increase commuting, destroy an Area of Great Landscape Value and put pressure on existing services.

Response:

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other issues. Land is being provided via Area Local Plan to secure additional local employment opportunities. Areas of Great Landscape Value and other local landscape designations are under review and could be replaced.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

A business park in Wormit is inappropriate as the village's residents are employed in Dundee, St Andrews, etc. Demand should lead the location of business development.

Response:

Disagree. The provision of land which offers the possibility to establish local employment opportunities is necessary if we are to move to reduce commuting.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Support for Policy ENV1 and suggest that this should be extended to include protection for Wormit.

Response:

Support for Policy noted. It is considered however, that Green Belt designation for Wormit is inappropriate.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Accepts the need for a new secondary school in the Tay Bridgehead area built at a location with good transport links. Suggests this should be between Newport and Tayport where new housing and shops could also be provided. Rolls at a primary school in Wormit should not be a reason for housing development.

Response:

Fife Council is undertaking a review of the delivery of education services for the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Support for a rail halt at Wormit, but consideration must be given to travel to the halt, such as a relief road from Newport. Questions how this project would be funded.

Response:

Support noted. Access routes would be considered through the Area Local Plan and planning application. The Action Plan which accompanies the Structure Plan gives information on primary funding.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Whilst it is accepted that some houses are needed in the Tay Bridgehead area it is considered that any development especially in the Wormit area should take account of a number of factors, including the destruction of an Area of Great Landscape Value, the increase in traffic on an already overloaded village road, the lack of amenities in the area, the damage to an existing rural community, and the requirement for addition health care facilities.

Response:

The numbers have been reviewed and the Finalised Plan Housing allocation to the Tay Bridgehead area (Tayport, Newport and Wormit) is reduced from 750-950 to 500. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other issues. It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Public Transport

Comment:

Concept of a rail halt in Wormit is supported. However, good access to the rail halt must be taken into consideration.

Response:

Support noted. Access to the rail halt will be fully considered through the Area Transport Plan and planning application process.

Action:

Campbell, Robert - Wormit, Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Development on this scale at Wormit is not justified, but should be sympathetic to the size and nature of existing provision and realistic in terms of impact. Development should focus on Mid Fife.

Response:

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other issues. Development is focusing on Mid Fife but the needs of other areas are not being ignored.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

The Newport Public meeting was a shambles and the follow-up meeting on 18th April was not well publicised. This was a missed opportunity to inform local people of the proposed developments.

Response.

The follow-up meeting on 25th April at Newport was publicised in the Local Press. Those who were not able to attend the original meeting but supplied their details were advised of the additional arrangements in writing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Concerns that the Plan will accelerate the depopulation of Dundee and add to commuter travel. Unaware of consultation with the neighbouring authority in terms of impact on services, especially health.

Response:

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. Dundee City Council and other adjacent authorities have been consulted as have the various service providers.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Brownfield Land

Comment:

Agrees with the use of existing brownfield sites, which could improve a number of sites across Fife, particularly in Mid Fife, but concerned that this would be a less attractive option for developers.

Response:

Support for use of brownfield sites noted. The strategy of restricting the release of greenfield sites tends to increase attractiveness of brownfield sites. Fife Council will be promoting brownfield sites for re-development through a number of publications. Preference for brownfield sites is also stated in national planning guidance.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Reference in Draft Plan Proposal PT2 to Wormit Station should be removed as previous studies have questioned the economics of such a development. The proposed site would not accommodate the facilities required. Suggests bringing together a rail halt and park-and-ride close to the A92 at Sandford.

Response:

Wormit proposals endorsed by Scottish Executive in approving the Fife Structure Plan 2002. The details of the proposed site are addressed by the St Andrews and East Fife Local Plan. Draft Plan Proposal PT2 now Finalised Plan Proposal PT1.

Action:

Draft Plan Proposal PT2 now Finalised Plan Proposal PT1.

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Water and Drainage

Comment:

Ongoing problems with waste water management in the area has resulted in a halt on development to allow remedial work. The new treatment plan has a reported capacity of 900 homes, but development should be restricted until the new facility has proven itself.

Response:

The Finalised Structure Plan seeks the timely provision of appropriate infrastructure in support of new development, as detailed in Policy DC1 and Proposal DC1.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Concern at the figure of 45% and its inconsistency with the Scottish Executive guidance. Not aware of any local need to justify such a figure.

Response:

PAN 74 was published after the Consultative Draft Structure Plan was approved. The percentage requirements for the St Andrews housing market area (HMA) have been revised based on this advice and on the results of the updated Housing Needs and Affordability Study, which identified a need for just under 1,500 new affordable houses in that HMA.

Action:

Change percentage requirement in H4 (was H5).

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Further thought should be given to traffic management, particularly in the Bridgehead area. Existing problems would be exacerbated by development in the area.

Response:

Traffic management issues are addressed by Transportation Services via Local Transport Strategy and Area Transport Plans. It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

No Change

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Development on the scale proposed at the Tay Bridgehead would increase demand for school places. It is unclear how existing facilities would cope and how new-build facilities would be financed. Funding problems could delay development for some time. The choice of any site for a further secondary school in the area should dictate the location of any new housing, reducing travel to school and enabling it to be developed as a community resource.

Response:

Fife Council is undertaking a review of the delivery of education services for the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population.

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

There is little reference to jobs in relation to the housing proposals and no specific mention of how the plan will generate new employment. This suggests that there will be significant commuting, adding to traffic volume.

Response:

The provision of land for local employment opportunities is necessary if commuting is to be reduced.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

Not aware of discussions with partner agencies in relation to the impact of developments on health care provision, from acute care to health centres. Local facilities are in need of improvement and protracted delays over new facilities at St Andrews will limit available funding for other projects for many years.

Response:

Information on liaison with health care providers is in Action Plan at Paragraphs 3.3 - 3.5. Health care issues are a matter for NHS Fife to determine. Fife Council liaises with providers and they have been involved in the Plan preparation process and fully aware of the content of The Finalised Structure Plan.

Action:

No Change

Comment No: 12

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

It is unclear whether the existing facilities in the area could cope with the new development. In particular the secondary school provision for the future requires resolution. The plans make no reference to this matter at all. This should be addressed in the Finalised Plan.

Response:

The Finalised St Andrews and East Fife Local Plan will provide details of infrastructure and facilities required in association with new developments. Also information in Proposal DC1 of Finalised Plan.

Action:

No Change

Comment No: 13

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

There are no specific references within the Structure Plan indicating where or how new employment will be generated to provide new jobs for the many people who will occupy the new homes in the Tay Bridgehead area.

Response:

The housing land allocation for the area has been reduced significantly in the Finalised Structure Plan. There is no strategic employment land allocation, but, appropriate land will be allocated via the Area Local Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

There appears to be no indication of discussions with agencies regarding the impact any developments on health care provision in this area. Whilst the NHS in Tayside currently provides acute services for the area the provision of other facilities is the responsibility of NHS Fife. There is currently a backlog of refurbishment and new build of community hospitals/health centres in the area. There is no clear indication of commitment to funding other projects in the years ahead.

Response:

Discussions have been held with the health care providers. Whilst Fife Council can identify the land required to service the health care sector, the provision of the building and services are dealt with by the appropriate health care providers. The long-term approach adopted by Fife Council in the Finalised Plan assists such agencies in their long-term planning.

Action:

No Change

Comment No: 15

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

I tried and failed to gain access to the meeting staged at Newport on 12th April and I consider that the organisation was best described as a shambles. The further meeting was held on the 25th April but this was not given the publicity it deserved (no doubt to keep the numbers down). It is considered that this was a missed opportunity to inform the majority of people locally who, like me, are concerned about the scale of proposed developments and their impact on the existing community.

Response:

The follow-up meeting on 25th April at Newport was publicised in the Local Press. Those who were not able to attend the original meeting but supplied their details were advised of the additional arrangements in writing.

Action:

Paterson, R - Wormit, Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Paras 1.29, 3.1 and 4.24 basically state the same aim: "to safeguard and improve the distinctiveness of Fife's landscapes and coastlines, including the landscape setting of towns and villages". Believes that the proposals for the Tay Bridgehead will compromise the landscape of Wormit in contradiction of the Fife Structure Plan policies.

Response:

The approach to implementing the development planned via the Local Plan, Master Plans and development briefs will ensure the character and distinctiveness are retained.

Action:

Clift, Ben - Wormit, Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

The Newport public meeting failed to present a coherent case for the need for the proposed housing at the Tay Bridgehead. There is no convincing evidence base for the number proposed when the national population is declining and the current local waiting list for houses is only 200. Concern that the proposed development is "population engineering" to link this development to the regeneration of Mid Fife.

Response:

The public meetings were designed to inform people about the consultation exercise and where the information was in the documents. There was however limited opportunity to discuss the Plans in the hall but after the presentations officers were available to answer queries about the content of the Plan. The General Register Office, Scotland, population projections provide the official evidence base. The 2004 based population projections published in December 2005 will be incorporated in the Plan.

Action:

Review consultation process. Update the population projections and the housing land requirements to reflect them.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Proposals for large numbers of new houses are not supported an equal determination to deliver transport improvements, which may or may not be provided by third parties. Without a firm commitment, these proposals can only be described as "aspirations".

Response:

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

No objection to affordable housing per se, but to allowing developers to draw in people for profit.

Response:

Comment noted.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Local landscapes have received appropriate formal designation. What has changed to suggest that development is now appropriate in the area? Brownfield sites should be the primary targets for any genuine development need.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. Brownfield land is provided for development. However, in areas where there is insufficient brownfield areas a limited amount of greenfield land must be released for development.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Suggest that Dundee City Council is unhappy with the proposals.

Response:

Dundee City Council has responded to consultation on the Draft Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Concern that development will bring further relocation of "problem families", and that effective measures have not been taken to address social problems which have occurred in Tayport.

Response:

This is not a strategic planning issue.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

An acceptable proposal would accept greenfield sites, provide a realistic number of houses based on need and guarantee infrastructure improvements.

Response:

The delineation of development areas in the Draft Area Local Plan has taken full account of the landscape and other issues.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

More public meetings should be held, with adequate notification. It was felt that public opinion was heard and then ignored, creating a disconnection between the public and the local authority. The opportunity remains to build bridges and indicate that objections will not only be heard, but also acted upon.

Response:

The dates for public meetings in East Fife were published in the statutory advertisement for the Plan and elsewhere the meetings were advertised extensively throughout the exercise. All objections and comments are considered prior to finalising the Plan. The consultation process is under review to improve consultations in the future.

Action:

Review consultation process. Housing allocation for Tay Bridgehead (Wormit, Tayport and Newport) reduced from 750-950 to 500 in the Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

It is considered that anyone who attended either meeting in Newport will be in no doubt that the Council Members and officials failed to present a coherent case to sway the public, either in relation to the need for the proposed house numbers, or in relation to the fundamental issues regarding the local infrastructure - roads, rail lines, schools and health care. It is considered that the presentation on transport in the first meeting was, in fact, deliberately misleading. It was clear that the public at the meetings felt that whatever objections they had, they would at best be heard and then ignored. Such a disconnection between the tax-paying public and elected officers and civil servants is a sad reflection of society, particularly when this is a local issue, barely involving national government. The opportunity is still there to build bridges, but only by a clear indication that the plans are genuinely changeable and any objections will not only be heard but also acted upon.

Response:

The public meetings were designed to inform people about the consultation exercise and about where the information was in the documents. There was an opportunity to raise questions with officials and displays, and officers were available prior to the meeting. All objections and comments were considered prior to finalising the Plan. The consultation process is under review to improve consultations in the future.

Action:

Review consultation process.

Campbell, Bill - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Concerned at the apparent lack of thought given to the proposed development and its scale in relation to Tayport's existing population. Local services and roads could not cope with an increased population, leading to traffic congestion.

Response:

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan. The delineation of development areas in the Draft Area Local Plan has taken full account of the landscape and other issues.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Water and Drainage

Comment:

Will the new works under construction at Tayport/Newport be capable of handling the development proposed at the Tay Bridgehead?

Response:

The Finalised Structure Plan seeks the timely provision of appropriate infrastructure in support of new development, as detailed in Policy DC1 and Proposal DC1.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

The large turnout at the Newport public meeting was an expression of local concerns at the development proposals. It is hoped that the objections raised were noted and will be acted upon.

Response:

Concern noted. All objections and comments have been considered prior to finalising the Plan. Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Action:

Petrie, J M - Wormit, Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Concern that the comments form is designed to deter people from commenting. The public meeting in Newport was disorganised and the chair did not adequately restrict the time allowed by each questioner, so that not enough people had a chance to air their views. Suggest that the planning committee make an effort to talk to residents.

Response:

The comments form was designed to assist people in making comments and the views of those who do not use the form are fully considered. The chair had to work within the agenda timetable and in this instance not everyone had the chance to comment. There was scope at the meetings to raise issues with Fife Council staff. The suggestion that the committee meet residents is noted.

Action:

Review consultation process.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Concerns that good arable land is given up for houses that are not needed. Local roads and services could not cope with an increased population.

Response:

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan. The delineation of development areas in the Draft Area Local Plan has taken full account of the landscape and other issues. Brownfield land is provided for development. However, in areas where there is insufficient brownfield areas a limited amount of greenfield land must be released for development.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Draft Plan Proposal PT2, for a Tay Bridgehead Park and Ride, is not well located. Welcomes the proposed rail station at Wormit, which would require works to surrounding access roads.

Response:

The details of the proposed site for a Park and Ride are addressed in the St Andrews and East Fife Local Plan. Support noted.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

It is considered that the meeting held in the Blyth Hall in Newport on Tuesday 12 April was a shambles. Evidently the Council officials are not aware of the strong feelings against their proposals. The chairman did not put a time-limit on each question, and only one question should have been allowed per person. If that had been applied more people would have had a chance to air their views.

Response:

The chair had to work within the agenda timetable and not everyone had the chance to comment. The public meetings were designed to inform people about the consultation exercise and about where the information was in the documents. There was however an opportunity to raise issues with officials. Comment and suggestions are noted for future.

Action:

Review consultation process.

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

There is concern that the comment form used by Fife Council is an attempt to put people off commenting.

Response:

The comments form was designed to assist people in making comments. However, concerns are noted. The views of those who did not use the form are fully considered.

Action:

Review consultation process.

Birse, Ronald - Wormit, Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Objects to the proposal for development at the Tay Bridgehead, which is out of scale with the rural community and would encourage commuting. The proposals are contrary to the Tay Coast Local Plan, the Fife Structure Plan 1994, Fife Council's guidance on New Housing in the countryside and NPPG3.

Response:

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan. The provision of land for employment purposes should assist in securing local employment opportunities in Fife. Tay Coast Local Plan is to be replaced by St Andrews and East Area Local Plan and 1994 Structure Plan was replaced by the Approved Fife Structure Plan 2002.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Proposed development would affect the setting of Wormit in relation to the surrounding Area of Great Landscape Value, which is contrary to Fife Council Policy in the Fife Structure Plan and Tay Coast Local Plan. Development should focus on brownfield sites to regenerate communities, rather than on high quality agricultural land.

Resnonse

The delineation of development areas in the Draft Area Local Plan has taken full account of the landscape and other issues. Support for use of brownfield sites noted. The strategy of restricting the release of greenfield sites tends to increase attractiveness of brownfield sites. Fife Council will be promoting brownfield sites for re-development through a number of publications.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Residential development would put pressure on local services and facilities, requiring excessive infrastructure expenditure by the Council.

Response:

It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

It is considered that any development in the Bridgehead area should be focused on one area adjacent to the Forgan Roundabout. This would allow work to proceed with out the long-term disruption involving noise, dust, heavy earth-moving vehicles and deliveries of materials otherwise implicit in these proposals.

Response:

Suggestion noted. The Newport settlement boundary has been extended up to the Forgan Roundabout in the draft Area Local Plan.

Action:

Willis, R G - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Seeks justification for the plans to increase the population of the Tay Bridgehead area by such a large percentage. Suggests that there is conflict between the Fife and Dundee Council's in this regard and that a public inquiry is held.

Response:

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan. The delineation of development areas in the Draft Area Local Plan has taken full account of the landscape and other issues.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Concern that large land releases in the area and people commuting to Dundee will result in the area becoming part of Dundee City.

Response:

The delineation of development areas in the Draft Area Local Plan has taken full account of the landscape and other issues.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Concern that the area identified for development is a community resource for recreation and contains a right of way, and a range of wildlife interest which would be lost.

Response:

Land for development will be identified via the Local Plan process and Master Plans and development briefs this will ensure that recreational uses and biodiversity/nature conservation issues will be fully considered.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

The proposed development will have a negative impact on house prices in the area, local services are unable to cope with the scale of development proposed, e.g. water and drainage, health care, police.

Response:

House price impacts is not a strategic planning issue. It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Concerns about the retention of any affordable housing built.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the Council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Objects to the development proposed for the Tay Bridgehead, as it will further stress educational resources in the area and increase congestion from travel to school trips.

Response:

Objection noted. Fife Council is undertaking a review of the delivery of education services for the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population. Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

The consultation documents are full of data but sparse on specifics. The consultation period is short for the consideration of the range of documents.

Response:

The Structure Plan is a strategic document and is not intended to address specific site related issues, which is the role of the Area Local Plan. The Draft Structure Plan was in the public domain from late November 2004. The consultation period was in excess of the statutory requirements and late submissions were accepted.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

A more precise description of the term "affordable" is required.

Response:

Affordable Housing is defined in the Glossary Section of the Finalised Structure Plan and this is the same as that used by the Scottish Executive. It is defined as "Housing of a reasonable quality that is affordable to people on modest incomes. In some places the market can provide some or all of the affordable housing that is needed, but in other places it is necessary to make housing available at a cost below market value to meet an identified need."

Action:

Newport Primary School Board, Laird, Callum - Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Concerns regarding the proposed location of the Park and Ride facility in relation to Newport Primary school. Suggest that a site beside the railway as well as the road network would provide greater travel flexibility.

Response:

Concerns noted. The proposed park and ride is considered to be well located in terms of transportation to provide for Newport and the surrounding settlements. A location near the railway would be premature pending the finalisation of a site for the rail station/halt.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Concern about the strain on local education of a potential increase in housing and pollution at the Tay Bridgehead. To cope with any increase in pupils, improvements should be made before the increase in housing and population. Concern that a significant increase in the school roll would change its character and the quality of education provided.

Response:

Concerns noted. Fife Council is undertaking a review of the delivery of education services for the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population which has been reduced from 750-950 to 500 in the Finalised Plan.

Action:

Reduce housing allocation from 750 - 950 to 500 in the Finalised Plan.

Dykes, Andrew - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Does not consider that the scale of new development is appropriate for Tayport. Concerns about the cumulative impact of development, given that Tayport has had recent development at two locations.

Response:

The delineation of development areas in the Draft Area Local Plan has taken full account of the landscape and other issues. Concerns about detailed development proposals should be addressed via Area Local Plan and at Master Planning and development brief preparation stages.

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan.

Action:

Gallon, John

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Previous studies have indicate that the town has reduced capacity for housing. Questions the Draft Plan's proposals for 1800 houses over 20 years, with concerns that the majority of these will be "executive" housing rather than providing needed affordable housing.

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements. The need for affordable housing is recognised (see Finalised Plan Policy H4). St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Mason, Rebecca - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

It is considered that developing new housing in the Tay Bridgehead area will result in the loss of the most beautiful scenery in the whole of Fife and would also result in unacceptable pressures on the education, health care, road network, and it is considered that the road network would be unable to cope with the increased population.

Response:

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan. The delineation of development areas in the Draft Area Local Plan has taken full account of the landscape and other issues. It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned. It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

It is considered that child care is an issue that has not been addressed and that there is currently almost inadequate supply of child minders within the area.

Response:

This is not a strategic planning issue.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

There is concern that new housing may bring with it an undesirable element and this concern is raised by a recent experience in Tayport.

Response

Concerns noted. This is not a strategic planning issue.

Action:

Towns, Amy - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Objects to development proposed for the area, particularly Tayport, which would require a new school and stress local services.

Response:

Objection noted. It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

Wallace, Madison - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Objects to development proposed for the area, particularly Tayport, which would impact on local services, including education and health.

Response:

Objection noted. It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

Adamson, Laura - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Objects to development proposed for the area, particularly Tayport, which will result in loss of open space and place undue pressure on local services.

Response:

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan. The delineation of development areas in the Draft Area Local Plan has taken full account of the landscape and other issues. It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned. It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

Ricketts, David - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Objects to development proposed for the area, particularly Tayport, which will result in loss of open space and place undue pressure on local services.

Response:

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan. The delineation of development areas in the Draft Area Local Plan has taken full account of the landscape and other issues. It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

Harris, Fraser - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Objects to development proposed for the area, particularly Tayport, which will result in loss of open space and place undue pressure on local services.

Response:

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan. The delineation of development areas in the Draft Area Local Plan has taken full account of the landscape and other issues. It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

MacDonald, Jamie - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Objects to development proposed for the area, particularly Tayport, which will result in loss of open space and place undue pressure on local services.

Response:

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan. The delineation of development areas in the Draft Area Local Plan has taken full account of the landscape and other issues. It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

Fraser, Kerri - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Objects to development proposed for the area, particularly Tayport, which will result in loss of open space and place undue pressure on local services.

Response:

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan. The delineation of development areas in the Draft Area Local Plan has taken full account of the landscape and other issues. It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

Hughes, Ailsa - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Objects to development proposed for the area, particularly Tayport, which will result in loss of open space and place undue pressure on local services.

Response:

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan. The delineation of development areas in the Draft Area Local Plan has taken full account of the landscape and other issues. It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

Jordan, Sean - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Objects to development proposed for the area, particularly Tayport, which will result in loss of open space and place undue pressure on local services.

Response:

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan. The delineation of development areas in the Draft Area Local Plan has taken full account of the landscape and other issues. It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

Gaffney, Jess - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Objects to development proposed for the area, particularly Tayport, which will result in loss of open space and place undue pressure on local services.

Response:

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan. The delineation of development areas in the Draft Area Local Plan has taken full account of the landscape and other issues. It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

Dykes, Samantha - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:
No comment.

Response: Noted.

Action:

Brown, Gordon - Cowdenbeath

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The Structure Plan is very positive and ambitious. Welcomes the proposals to grow Fife's population, thus increasing the local market, the Plan's focus on growing the economy and its commitment to regeneration. Support for the Plan's proposals to improve transport links to and within Fife.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Fully supports the Plan's policies and proposals advanced in the plan for the regeneration of Mid Fife and the Coastal Regeneration Zone.

Response:

Support noted.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Supports the Plan's strategy as regards higher education and in this context welcomes the creation of the Adam Smith College Fife which will be a major asset in contributing to economic development.

Response:

Support for strategy noted.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Appreciates the challenges set by the Plan's ambitious proposals as regards the scale of development and achievement of the desired outcomes.

Response:

Support noted.

Action:

Brocklebank, Ted - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

To what extent does the proposed increase in housing and population in St Andrews and East Fife represent local demand and to what extent developer-led expansion? Requests information on the population increase for this area over the last decade.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth. The information on population is available in various published documents from the General Register Office Scotland.

Action:

No change in planning for 5% growth.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Concern that development-led building on the scale envisaged could threaten the future of the town. Concern that the currently approved and proposed land allocations could provide almost 2000 more homes during and beyond the Plan period.

Response:

Partial support noted. The numbers have been reviewed and the revised figures are shown in the Finalised Structure Plan at Proposal H2.

Action:

A number of changes have been made to the strategic housing allocations as detailed in the Finalised Plan at Proposal H2.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Justification required for the change from a Nil requirement in St Andrews in the 2002 Structure Plan to the current figure proposed.

Response:

There have been significant changes in population since the preparation of the Adopted Structure Plan, such as growth in household formation and inward migration. An ongoing reduction in household size, as detailed in the Report of Survey, is the main driver for new housing. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Current proposals for St Andrews renege on commitments made when the Fife Structure Plan 2002 was approved. They do not encircle the town or preserve its landscape setting.

Response.

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries.

Action:

Policy and text amended.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Aware of the pressures for affordable housing in East Fife. If St Andrews has the highest percentage of households in need of affordable housing, questions why no part of the funding received from Communities Scotland has been assigned to the town.

Response:

Communities Scotland is aware of the identified shortages in the St Andrews area. Consequently, several developments have been financed in the area in the last few years. Recent projects in the St Andrews area amount to £5 million investment from Communities Scotland. Fife Council and Communities Scotland are continuously reviewing land availability in the St Andrews area and funding has been provided to Kingdom Housing Association to identify future opportunities for housing.

Action:

Scottish Natural Heritage, Leys, Katherine - Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Concern that previous discussions have not been reflected in the Draft Plan, which concentrates primarily on encouraging the economic development of Fife. Considers that the Structure Plan does not adequately provide a framework for Development Planning and while appreciates that some of this should be provided by Local Plans, is of the opinion that this must be supported by basic principles defined in the Structure Plan.

Response:

The Finalised Plan provides the framework for detailed planning at local level and Local Plan is consistent with the Finalised Plan. The Report of Survey contains background information.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Sustainability

Comment:

This Plan should provide a Strategic Plan for the use and development of land that seeks a sustainable balance between society, the economy and the environment. SNH considers that there is an imbalance in the plan, with a focus on economic development.

Response:

Whilst there is a focus on encouraging economic development in the Structure Plan the overall Development Plan policy guidance ensures a balanced policy framework which takes full account of social and environmental issues.

Action:

No Change

Comment No: 03

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Sustainability Appraisal

Subject: Document

Comment:

Considers that the document may be inadequate in relation to Strategic Environmental Assessment (SEA) and highlights that any delay in timescales may result in the Plan being subject to the SEA Regulations.

Response:

A Sustainability Appraisal and a Strategic Environmental Assessment has been undertaken on the Finalised Plan; the latter meets the new legislation requirements.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: City Region Planning

Comment:

Seeks clarification as to how the Plan would be incorporated into the City Region planning process. Considers that the Plan should have been drafted in close liaison with representatives from Edinburgh and Dundee Councils.

Response:

Assuming that it is approved by the Scottish Ministers committed development proposals would be a feature of the City Region Structure Plans for the period to 2026. Both Edinburgh and Dundee Councils (and other neighbouring authorities) have been consulted throughout the drafting of the Plan.

Action:

No Change.

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Natural Environment

Comment:

SNH expects that the duties on public bodies of the Nature Conservation (Scotland) Act 2004 will be reflected in Structure and Local Plan policy and welcomes the inclusion of relevant policies in this Plan. Draws attention to the National Biodiversity Implementation Plans 2005-2007, which are relevant to the Structure Plan. SNH supports the view that strategic and development planning in Fife would benefit from greater in-house ecological advice.

Response:

Additional sentence can be added in Structure Plan to mention Fife Council has objectives under the Natural Biodiversity Implementation Plans. However specific policy guidance is more appropriately dealt with via the Local Plans.

Action:

Add additional sentence to Para 4.8 in Finalised Plan. Amend Policy ENV4 (was ENV6) to insert "and species".

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Reiterates previous advice that the environment of many of Fife's towns (including, but not exclusively, St Andrews) are sensitive to development and are valued by inhabitants and visitors. Their qualities and landscape settings could be compromised by over-development.

Response:

The framework for detailed planning set out in the Finalised Plan provides for sensitive planning via Area Local Plans, Master Plans and development briefs.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Tourism

Comment:

St Andrews is considered already to be a World Class tourist destination. Requests information as to how it is to be developed to become more so, as per para 1.16.

Response:

This will be achieved via the partnership to deliver St Andrews World Class. St Andrews' international heritage is acknowledged by the Finalised Structure Plan, however there is always scope for improvement.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

SNH continues to support the use of the Landscape Capacity and Enhancement studies for Dunfermline, Kirkcaldy, Levenmouth, Lochgelly and Glenrothes, which refer to the opportunities and constraints, and refers to previous comments on the suitability of the large-scale expansion plans for these settlements.

Response:

Comments noted. These will be taken into account in the emerging Local Plans which will delineate the boundaries of development areas.

Action:

No Change

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Medium-scale development, as described in para 2.6, may appear to be relatively small in scale, but the host environment may be sensitive and relatively small-scale development may have a disproportionately adverse effect. A figure of "1000 houses" is not a sufficiently sensitive method of identifying when development may mean a small or medium-scale impact. Recommends that policy for directing medium-scale development is refined in light of landscape plans and capacity studies.

Response:

The approach of defining Strategic Development Areas and Medium Scale Development Areas has been applied consistently throughout Fife. This terminology has been reviewed in finalising the Plan Proposal H2, and Medium Scale replaced by Other Strategic Land Allocations.

Action:

Amend Plan (Proposal H2).

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Seeks clarification of para 1.14, which states that there will be "medium-scale growth". Does this mean that the development of more than 1000 houses in St Andrews is not anticipated in the Plan period? The capacity of housing allocated in the Draft Local Plan indicates that St Andrews should be a Strategic Development Area rather than medium-scale development.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Countryside Access

Comment:

Draft Plan Policies DC1 and DC2 do not adequately reflect the need to ensure good quality access and recreation planning into development proposals and the incorporation of path networks into the core path network as required by the Land Reform (Scotland) Act 2004.

Response:

Policy DC2 has been renamed Proposal DC1 in the Finalised Structure Plan. Policy DC1 and Proposal DC1 cannot specify in detail all the potential types of planning gain which may be sought. More detail will be provided through the new Local Plans and development briefs. However, Finalised Plan Policy ENV6 seeks to address this issue in principle.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Brownfield Land

Comment:

SNH supports the policy objective to promote the reuse of brownfield sites to deliver community regeneration.

Response:

Support noted.

Action:

No Change

Comment No: 13

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Coast

Comment:

Supports Draft Plan Proposal PT1 and highlights the need for the masterplan to be designed to avoid any adverse impacts to the Firth of Forth Special Protection Area (SPA) and Site of Special Scientific Interest (SSSI).

Response:

Support for Draft Plan Proposal PT1 (Finalised Plan Proposal PT2) noted. Master plan will take full account of requirements to protect the natural environment as per Finalised Plan Policies ENV2; ENV3 and ENV4.

Action:

No Change

Comment No: 14

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Concern at the potential impact of a new Forth Crossing and associated infrastructure on a number of designated sites in the area around potential bridge sites and bridgehead areas. A lack of detail on likely locations precludes more constructive comment. SNH draws attention to Fife Council's duties in relation to SPAs SSSIs. Offers to share experience of the new Kincardine Crossing and the work done there to avoid adverse impacts to the Forth SPA.

Response:

The Structure Plan gives support to the provision of a new Forth Crossing, the location of which would be considered after further studies. The issues relating to nature conservation would be fully addressed and resolved via an Environmental Impact Assessment prior to the construction of the proposed new bridge and associated works.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: New Forth Crossing

Comment:

The proposed Forth Crossing at Queensferry should be considered in the context of sustainable and strategic development. The western approaches to Edinburgh are a bottleneck to travellers, and would be exacerbated by further cross-Forth traffic. Co-operation of City of Edinburgh, other Councils and the Scottish Ministers is required to construct a strategic approach to transport needs in central and south-east Scotland. Reference to joint proposals to resolve the constraints of the west Edinburgh transport corridor would be a helpful addition to the Plan.

Response:

Concerns noted. The Finalised Structure Plan supports the efficient use of the existing Forth Crossing and in looking forward 20 years must consider the potential requirement for a replacement or additional multi-modal crossing at Queensferry. Further evaluation of options will be taken forward by the Scottish Executive through the agency Transport Scotland and by the South East Scotland Transport Partnership.

Action:

No Change

Comment No: 16

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Policy R3 of Draft Plan refers to "identified broad areas of search" which are not mapped in the Plan. A map or related Key Diagram should be included in order for the policy to be meaningful. The policy should also refer to the effect of cumulative impact on the landscape.

Response:

Key Diagram indicates Area of Search for wind turbine development. Policy R3 allows for consideration of cumulative impact issues. Draft Plan Policy R3 now Finalised Plan Policy R1.

Action:

Key Diagram in Finalised Plan shows Areas of Search for wind turbine development.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Seeks clarification about Policy R3 of the Draft Plan. It is SNH's understanding that areas of search for wind farms will be defined in Local Plans. Since there will be a time period during which Local Plans are being reviewed but have not yet defined areas of search, SNH assumes that the broad search areas defined in the approved Structure Plan 2001-2011 will apply until such review. Confirmation is sought on this matter.

Response:

Fife Council will take account of the Finalised Structure Plan in determining planning applications. Draft Plan Policy R3 now Finalised Plan Policy R1.

Action:

No Change

Comment No: 18

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Policy ENV1 should be clearly linked with the Landscape Capacity and Land Enhancement Studies for these areas. The Plan should give greater guidance on how their designation will give them a greater level of protection.

Response:

It is considered that the delineation of Green Belt boundaries and policy guidance are more appropriately dealt with in Local Plans.

Action:

No Change

Comment No: 19

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Notes that full policy detail will be provided in relevant Local Plans, but considers that the example set in the Draft St Andrews & East Fife Local Plan is inadequate to protect Green Belt areas and encourages development. Green Belt policy should identify that no development is permitted, except in specified circumstances, but the example set in the draft Structure Plan and Local Plan states the circumstances in which development will be allowed.

Response:

The boundary of the St Andrews Green Belt is delineated for the first time in the Draft Local Plan. Local Plan policies specify limitations on development in the designated area.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Design Quality

Comment:

Questions the title of the "Urban Design Guide" referred to in Draft Plan Policy ENV3. Concern that specific reference is not made to rural design principles.

Response:

The principles contained in the document will be a material consideration in all instances both urban and rural. The term 'urban design guide' is used nationally. Draft Plan Policy ENV3 will be included in Area Local Plans.

Action:

Draft Plan Policy ENV3 will be included in Area Local Plans.

Comment No: 21

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Natural Environment

Comment:

The Nature Conservation (Scotland) Act 2004 requires certain conditions to be imposed where a permission is given where there are social or economic benefits of national importance which outweigh and nature conservation impacts. Suggests addition of: "Such cases will be subject to the terms of Section 15 of the Nature Conservation (Scotland) Act 2004."

Response:

Agree to addition of sentence referring to Act as suggested.

Action:

Add additional sentence.

Comment No: 22

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Natural Environment

Comment:

Supports the intent of Policy ENV6 of Draft Plan, but suggests amendment to: "Where development has the potential to impact on international, national, regional or locally important sites and species, applicants will be required to submit an ecological appraisal..." SNH will object to the policy unless such a change is made.

Response:

Agree to amendment proposed. Draft Plan Policy ENV6 now Finalised Plan Policy ENV4.

Action:

Amend Policy ENV4 in Finalised Plan to insert "and species", and successive wording.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Countryside Access

Comment:

Suggests the removal of phrase "special needs" from Draft Plan Policy ENV8 and that this be replaced with a reference to people with disabilities.

Response:

Noted. However, following advice it has been decided to retain the term "special needs" as this covers a wider cross-section of the community.

Action:

Policy ENV8 of the Consultative Draft Plan is now Finalised Plan Policy ENV6.

Comment No: 24

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Countryside Access

Comment:

It should be clearly explained how the Structure Plan will engage with the Fife-wide Core Path Plan and protect routes identified within the plan.

Response:

Paragraph 4.16 indicates Fife Council is committed to preparing a Core Path Plan. Once this Plan is prepared it will be fully integrated with the Development Plan. Finalised Plan Policy ENV6 also addresses the issue of countryside recreation and access.

Action:

Policy ENV8 of the Consultative Draft Plan is now Finalised Plan Policy ENV6.

Comment No: 25

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Key Diagram

Comment:

A number of comments or policies within the Plan refer to areas of search that do not appear on the Key Diagram. Clarification is required as to whether there are further diagrams and maps associated with the Plan which are not part of the current consultation.

Response:

The Key Diagram is the only "map" within the Structure Plan. More detailed guidance on areas is/will be set out in Local Plans or, for an interim period, in Supplementary Planning Guidance.

Action:

Rail Passengers Committee Scotland, Samson, Robert - Glasgow

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

In relation to para 3.48 and Draft Plan Proposal PT1 (Finalised Plan Proposal PT2), consideration should be given to encouraging greater use of the rail network for access to and from the port by: developing and marketing the connecting bus timetable to link ferry services with rail services at Inverkeithing; and introducing and marketing combined rail/bus/ferry ticketing to encourage rail travel.

Response:

The Finalised Structure Plan is supportive of greater use of public transport, including rail transport. The Local Transport Strategy and Area Transport Plan gives further details of service developments.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Welcomes overall context and strategy of the Plan, particularly with regard to improved integration between transport modes, modal shift and reducing the need to travel.

Response:

Support noted.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Consideration should be given to linking the Fife Structure Plan and the Regional Transport Strategies, e.g. SESTRAN, and to ongoing consultation with RPCS and/or passenger representative groups as policies are developed.

Response:

The Finalised Structure Plan has been prepared with due consideration to transport issues, as detailed in the Report of Survey.

Action:

Ore Valley Housing Association, Summers, Andrew - Cardenden, Lochgelly

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Lochgelly

Comment:

Welcomes the emphasis on Lochgelly as a Strategic Development Area for housing, population and economic development.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Large mono-tenure developments should be avoided. There is greater likelihood of sustaining integrated communities through the inclusion of mixed-tenure developments incorporating an element of affordable housing for rent.

Response:

Noted. The Finalised Plan is seeking to promote sustainable settlements which will be defined via Area Local Plans, Master Plans and development briefs.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

There is potential to address the shortage of affordable housing akin to the private sector solution, e.g. to allow development to 'ripple out' from the main demand locations such as Dunfermline, Cupar, etc. and locations (within Mid Fife) such as Lochgelly can contribute to addressing the shortfall through the application for the affordable housing Policy.

Response:

Comment noted. The planning system can contribute to meeting the need for affordable housing but cannot do so in entirety. The contribution required should be consistent with identified need.

Action:

Communities Scotland, Lang, Elspeth - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Welcomes the attempt to integrate the role of the planning system with regeneration efforts to produce mutual benefits for the Fife population and prospective new residents. The Fife Structure Plan makes good links between the National Planning Framework and priorities in Fife.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The strategy to achieve population growth relies on encouraging mobile housing demand to Central Fife which is not currently a competitive residential location for such demand and presents a challenge. Achieving this target will require commitment and integration between all Fife Partners and excellent monitoring arrangements.

Response:

Agreed.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

There is a clear relationship between economic strategy for Fife and the Draft Plan, but there is potential conflict in prioritising the development of the knowledge economy and simultaneously confining growth in the St Andrews Housing Market Area.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

There is limited evidence that allocating employment land adjacent to housing reduces the need to travel (para 1.17) at a local level. Further research is needed to establish the extent to which this happens and in what circumstances. This point is not considered key to the Plan's economic objectives and is an unconvincing environmental measure.

Response:

It is not anticipated that everyone would live and work in the same settlement, however, the proposals present this opportunity and increased inter-connectivity would allow local people to get to employment opportunities without the need for car travel.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Paras 1.20 and 1.21 are imprecise and undermine an otherwise good quality economic argument in the Draft Plan. A few more specific cases would help.

Response:

This is the role for the Report of Survey.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Building higher density housing near transport hubs (para 1.22 and Policy H8) is well supported by planning guidance, but developers/authorities have struggled to devise design solutions with broad consumer appeal. A recent report "Developing Urban Housing" is worthy of consideration.

Response:

Noted.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

"Cluster groupings" (para 1.26) requires clarification.

Response:

Clusters groupings are groupings of settlements in close proximity to each other.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The strategy should have discussed whether Fife Council is pursuing instances of land use with key land holding institutions other than the NHS.

Response:

Fife Council has no powers to require institutional landowners to release or retain land in its ownership.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

There should be greater reference to standards of management and design to be applied between existing settlements and the Strategic Development Areas, such as visual and functional integration. It would be valuable to commit to further research in relation to this critical point.

Response:

This will be addressed via the Local Plan preparation process.

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

It is questionable that St Andrews University's skill investment activity (para 3.10 of Draft Plan) is of benefit to Fife. Is there evidence that the education benefits of colleges in Fife are generally more retained in the area than for the University?

Response:

This can be seen by the fact that the group with the highest proportion of enrolments in Further Education in Fife, almost 70%, are those in permanent or temporary employment in Fife.

Action:

No Change

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

Interested to know the scale and nature of any trend of outward migration of Edinburgh firms to Lothians. Para 3.11 is vague and does not translate broad economic aspirations into specific land uses for rural Fife. How could land use planning facilitate further farm diversification?

Response:

Disagree that Paragraph 3.11 (paragraph 3.21 of the Finalised Structure Plan) is vague. The Finalised Plan supports rural business as per Paragraph 3.26. Detailed issues relating to farm diversification would be considered on a case by case basis in relation to policies in the Development Plan. The Structure Plan is a strategic Plan, detailed site specific issues are dealt with by Local Plans.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

The text on town centres and retailing (paras 3.21-3.27) is encouraging.

Response:

Paragraphs have been renumbered (now 3.30 - 3.36) although strategy remains the same. Support noted.

Action:

No Change

Comment No: 13

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Para 3.28, that housing can assist in attracting new households to areas of population loss is key to the strategy and should be backed up by case study evidence to assess the chances of success in Mid Fife and how they can be maximised.

Response:

The supporting information is contained in the Finalised Structure Plan Report of Survey.

Action:

No Change

Comment No: 14

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

In para 3.30, HMA should be written in full.

Response:

Comment noted. The abbreviation is widely used and there is no need to use full name in every instance.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The feasibility of some of the Strategic Development Areas needs to be proved. The risk that overallocation in Mid Fife and constrained supply in East Fife will lead to higher house price inflation in East Fife should be explored.

Response:

The identification and selection of the Strategic Development Areas is supported by a range of research and analysis, as outlined in the Report of Survey. The Plan focuses on the regeneration of Mid Fife, but does allow for modest growth in East Fife, to provide for local needs and to avoid constraining housing supply in the area.

Action:

No Change

Comment No: 16

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Managing the release of sites (para 3.37) is key and should be co-ordinated with neighbouring authorities.

Response:

Under existing land use planning legislation, there is no mechanism for managing the release of sites between local authority areas. Proposals for City Region Planning will, when approved, enable for co-ordination across local authority boundaries.

Action:

No Change

Comment No: 17

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Queries the use of the word "requirement" in the opening sentence of para 3.42, as it suggests that the Local Housing Strategy has official capacity in setting quota figures.

Response:

This is the precise wording that is used in Paragraph 5.8 of the Local Housing Strategy. This document was published before the release of PAN 74. It is acknowledged that the 30% figure was set as a benchmark. Wording in the Finalised Plan and Supplementary Guidance on Affordable Housing has been amended.

Action:

Amend text.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Concern that the allocation of medium-sized developments could negatively affect the in-migration market to larger-scale developments in Mid Fife. The medium-scale locations are potentially more attractive to commuters than the Mid Fife destinations.

Response:

Concerns noted. Finalised Plan Policy H3 addresses the phasing of residential development and the release of sites in a planned way that is supportive of the Structure Plan strategy.

Action:

No Change

Comment No: 19

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Housing Land Requirement

Comment:

The evidence base for boosting Fife housing demand is not convincing.

Response:

The Report of Survey describes the background and justification for increasing Fife's population. Since the Draft Plan, further work has been undertaken to look at demographic change in Fife. This reinforces the justification for the policy assumptions on population growth and provides further information to support the strategy.

Action:

No Change

Comment No: 20

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

With the ambitious plans to capture the in migration market and direct this to larger scale developments in Mid Fife it is not clear to what extent the allocation of medium sized development would negatively affect these proposals. It appears that all of the medium sized developments are located at the boundary of the authority thereby signalling their potential optimisation by floating commuters. As a choice between these new, but settled developments and new estates besides say Lochgelly it is considered that the households which may be likely to move to Fife would do so, but being almost channelled via these medium sized developments. Therefore, it is not simply a choice for choosing Fife over say Stirling, but also more attractive destinations in Fife over the Mid Fife destinations.

Response:

Concerns noted. It is intended that the new development in all of the areas proposed for development will be planned to ensure that they are attractive to all and that image of what is, wrongly, perceived as the less attractive towns will be improved.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Draft Plan Policies H5 and H6 provide a clear statement of affordable housing aspirations. The deliverability of these is clearly unknown, especially given experience in other local authority areas, so developer feed back on the supplementary guidance will be indicative.

Response:

The consultative draft Structure Plan and Supplementary Guidance have been tested and strengthened through the Fife Matters Consultation. During the process, feedback was received from developers, and this has been taken into account. Affordable housing is a dynamic issue and lessons have been learned from the experience in other local authority areas. Policy H5 has been renamed H4 and Policy H6 has been deleted.

Action:

Revise and renumber Draft Plan Policy H5 to Finalised Plan Policy H4 and delete Draft Plan Policy H6.

Comment No: 22

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Population Growth

Comment:

The report contains some useful demographic analysis and excellent employment land analysis. However, it is considered that the evidence base for boosting Central Fife housing demand is not convincing.

Response:

Support for demographic analysis and employment land analysis noted. In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Homes for Scotland, Melville, Blair - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Welcomes the consequential approach to allocating development land to accommodate potential growth, identifying a range of opportunities.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The emphasis on the regeneration of Mid Fife is overstated in terms of market potential, while the demands for development in the Dunfermline/Bridgehead area and East Fife are understated.

Response:

Disagree. The Finalised Plan clearly sets out the strategy and the reasoning behind the strategy.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Much of the Plan is based on private investment in land, infrastructure and amenities, but the scale of regeneration envisaged in Mid Fife, even over 20 years or more, is not in line with market forces. The view that the private sector can fund most or all development costs is unrealistic in areas of weak markets. The Plan should consider the levels of "pump-priming" from public agencies needed to begin to create stronger markets for housing and other development in Mid Fife.

Response:

The Finalised Plan seeks to drive the strategy to secure the regeneration of Mid Fife. It seeks to create the conditions for greater market interest in the area capitalising on the strengths of the area and redressing the perceived weaknesses.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

The Plan's language is likely to raise expectations that the private sector will fund a wide range of community infrastructure and "planning gain". The principles of Circular 12/1996 are critical – the development industry will meet its obligations but will not pay for infrastructure or facilities that are not a direct consequence of development.

Response:

The Finalised Plan sets strategic policy approach. Detailed discussions will follow once the process has been advanced via Area Local Plans, Master Plans and development briefs. Community infrastructure has two elements, the physical fabric of the facility and the staffing/running costs. The former would be provided by the developer the latter by other agencies including Fife Council.

The wording has been amended to take account of some of the wider concerns made in respect of contributions.

Action:

Amend wording. *Comment No:* 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Planning for demand to be exported from the Edinburgh and Lothians Structure Plan area to adjacent Structure Plan areas is not in line with SPP1, SPP3 and other Government policy in terms of sustainable land-use and transport patterns. The Draft Plan bases its aspirations on the inmigration trends of recent years, with an attempt to deflect some of that to Mid Fife. The Housing Market Areas Study shows the extent to which in-migrants to Fife are in reality commuters to the Lothians. If that trend is affected by the review of the Edinburgh and Lothians Plan or City Region planning, the proposed Fife Strategy will be weakened and any diversion to Mid Fife doubtful.

Response.

The Finalised Plan strategy seeks to locate the main amount of residential and employment land in locations which are well served by the public transport network and, to seek improvements to this network where appropriate. The areas identified in Mid Fife are well served by public transport links with Edinburgh.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The identified need for new strategic transport infrastructure to deal with cross-Forth movement raises the question as to whether the strategy is sustainable. Assuming that the market is driving trends for development in West Fife, it would be appropriate to ask for more detail on whether there is any commitment to these strategic projects.

Response:

It is considered that there is scope to accommodate increased levels of cross-Forth movement but that, in the longer term, additional capacity is required not as a result of new development in Fife but as a result of year on year growth in traffic in central/eastern Scotland. In view of the lead-in times these types of project require to be initialised as soon as possible.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The long-term requirements for Dunfermline are understated. The scale of mismatch between demand and allocations is unjustifiable.

Response:

Further consideration was given to the housing allocations and the Finalised Plan Proposal H2 show the outcome.

Action:

Revised housing allocations shown at Finalised Plan Proposal H2.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Lochgelly

Comment:

The industry remains doubtful that there is a market for growth in Lochgelly of the scale envisaged. This area forms part of the Mid Fife plan area where the stated objective is to promote growth and regeneration comment including deflection of demand from Dunfermline market area. Homes for Scotland cannot accept that the scale of deflection of demand is achievable. It is acknowledged that there is an element of over allocation in the plan, but regardless of that the same comparison of figures in the report of survey 5.52 and 5.53 reveals allocations ion Mid Fife varying from 3750 to 4750 per five year period against completions of 2240 in the period 1999 - 2004. Marked degree of aspiration seems unachievable, and the loading of allocations to the first period of the plan simply unrealistic, both in terms of the market and the time required to have the development plans approved and adopted. Certainly such growth would require substantial public sector investment in terms of environmental, transport or social facilities to create better market conditions.

Response:

Further consideration has been given in finalising the Plan to the strategic housing land allocations. Fife Council is confident that the level of housing proposed will be delivered within Lochgelly to assist in delivering the overall strategy. The allocation of housing development to Lochgelly is considered to provide the impetus for regeneration in this part of Mid Fife.

Action:

No Change

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Levenmouth

Comment:

The industry remains doubtful that there is a market for growth in Levenmouth of the scale envisaged. This area forms part of the Mid Fife plan area where the stated objective is to promote growth and regeneration comment including deflection of demand from Dunfermline market area. Homes for Scotland cannot accept that the scale of deflection of demand is achievable. It is acknowledged that there is an element of over allocation in the plan, but regardless of that the same comparison of figures in the report of survey 5.52 and 5.53 reveals allocations ion Mid Fife varying from 3750 to 4750 per five year period against completions of 2240 in the period 1999 - 2004. Marked degree of aspiration seems unachievable, and the loading of allocations to the first period of the plan simply unrealistic, both in terms of the market and the time required to have the development plans approved and adopted. Certainly such growth would require substantial public sector investment in terms of environmental, transport or social facilities to create better market conditions.

Response:

Further consideration has been given to strategic land allocations in finalising the Structure Plan. The Finalised Structure Plan retains a Strategic Development Area at Levenmouth.

Action:

No change

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Kirkcaldy East

Comment:

It is not clear what is meant in this section (the section referring to Kirkcaldy East) why references to improving the quality of existing stock. The implication is that private development is expected to contribute to this objective but Homes for Scotland would consider this to be an issue for the owners of substandard housing stock i.e. the Council or Housing Associations. Clearly the housing industry may be involved in the development of new housing, of all tenures, in regeneration areas but it must be clearly understood that it is no part for the role of the private companies to meet the costs of public sectors stock refurbishment. Clarity on this issue in both Draft Plan Chapter 2 and in Draft Plan Policy DC2 is required.

Response:

Specific reference to improving the existing stock has been deleted.

Action:

Reference has been deleted.

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is considered that in terms of numbers the land allocation in St Andrews is equivalent to most of the strategic growth areas. In view of the role that St Andrews has to play in the economic development in Fife and the particular problems in St Andrews relating to housing demands and costs that the St Andrews area ought to be acknowledged in the plan as a strategic growth area. The scale of growth suggested in the plan for East Fife, particularly St Andrews, is considered inadequate. Although extensively the allocations exceed recent compilations, the latter have been suppressed by previous policy and land allocations. Prices are a clear indicator of unmet demand, and it may be that the housing need assessment will reinforce the view that the housing market in East Fife is operating under substantial constraints.

Response:

St Andrews is identified in the Finalise Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is considered that bullet point six of subsection headed "taking account of" in Policy SS1 is unclear. Bullet pint five covers the issue of necessary infrastructure in terms of Circular 12/1996. Bullet point six could be read as "Fife Council seeking additional and unjustified contributions and if so, this bullet point should be deleted. If that is not the intention, then rewording is required along the lines "the wider benefits that may accrue to the community".

Response:

Fife Council is seeking to maximise the benefit to be gained from new development.

Action:

No Change

Comment No: 13

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is considered that Policy SDA1 should include St Andrews, as it meets the size threshold and is justified as a strategic economic location.

Response:

Strategic housing allocations have been finalised and are set out in Finalised Plan Proposal H2.

Action:

Strategic housing allocations are set out in Finalised Plan Proposal H2.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

The plan text is confusing in terms of developer contributions. The key principals guiding developer contributions are stated in Circular 12/1996, and the development industry accept that must deal with the consequences of development in terms of mitigating impact, however it is unacceptable for the Fife Council simply to state that "no cost should fall on the public purse, particularly in bringing forward large development sites". The public agencies have statutory duties such as the provision of education, which cannot be passed wholesale to the private sector. Enhancements to services to deal with any consequential need for expanded capacity are one matter, but wholesale provision to meet pre existing needs is unacceptable, as is the use in the document of ill defined terms such as planning gain.

Response:

Concerns noted. The text and related policies set out the need to deliver related infrastructure and facilities required to bring the large strategic land releases forward. The text is not considered inappropriate.

Action:

No Change

Comment No: 15

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Policy DC1 requires amendment by deleting the phrase 'any shortfalls and community infrastructure' since the only requirement on developers is to mitigate the impact of development. The entire sentence of this policy is superfluous, since the second sentence expresses the requirements of 12/1996 inadequately. The policy should be also amended by the addition of a final clause "subject to the viability of development not being jeopardised."

Response:

Policy DC1 is considered to be consistent with Circular 12/1996. Finalised Structure Plan sets strategic Policy approach. Detailed discussions will follow once the process has been advanced via Area Local Plans, Master Plans and development briefs. Finalised Plan Policy DC1 and Proposal DC1 provide details at an early stage in the planning process to both assist the development industry and provide clarity in terms of requirements.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Policy DC2 is excessive, since the justification of this extensive list of requirements is not made clear in either the plan or the Action Plan, despite the statements in the text that detail this provided. The statement that cannot be a requirement on developers to deal with the conditions of existing housing stock unless what is meant is redevelopment through demolition/redevelopment is reiterated. In addition in weak markets such as parts of Mid Fife the economics of development will not permit the contributions to every potential requirement, and Fife Council should recognise that viability is a key factor in what can be achieved. In addition it should be noted that the development industry is not minded to provide subsidy to other private businesses such as transport operators or retailers.

Response:

Improvement to existing stock reference has been removed. It is not considered that Finalised Plan Proposal DC1 is excessive, but rather provides more detail and clarity for the development industry and others.

Action:

No Change

Comment No: 17

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Paragraph 3.7 notes that the Action Plans and/or Local Plans may provide more detail. However, looking at Action Plan and St Andrews and the East Fife Local Plan, neither of these give any significant clarification on what is meant by some of the headings. No justification is apparent in terms of the school building problems which may arise, for instance, or the likely deficiencies in open space or recreational facilities. Nevertheless, developers now expect to provide many of these contributions as standard in major developments, and the purpose of this policy should be to identify the exceptional requirements which may attach to the strategic areas. The objective of a development plan should be to give clarity and certainty to the development industry, that requires much more detail on the requirements and thresholds in the development areas, translated into details in the action plan and local plans. These aspects of the Structure Plan require substantial development prior to the Finalised version.

Response:

The Structure Plan sets out the strategic approach to new development with Area Local Plans and Masterplans provided the detail. Finalised Plan Policy DC1 and Proposal DC1 provide the strategy framework and identify at an early stage in the Development Plan the requirements in relation to the Strategic land releases.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

It is noted that the housing needs assessment claims that there is a backlog of need for affordable housing in Fife of over 17,000. If that is so then the 17,000 should be included in the housing need at 2006, since SPP3 requires that plan land allocations make provision for all needs.

Response:

The updated Housing Needs and Affordability Study identified a backlog need for 10,832 houses. However over half of this can be met through solutions other than new housing. The Study goes on to identity a need for over 5,000 new affordable houses Fife wide. This is included in the calculations for housing land.

Action:

No Change

Comment No: 19

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The housing section of the Plan does not comply with the requirements of the SPP3. A timescale of twenty years is seen as desirable, which the plan contains, but SPP3 requires a firm overall requirement for 12 years (comprising of a 7-year and a 5-year phase respectively), with broad indications for the remaining period. Plus the plan should present allocations for 2006-2013, 2013-2018 and 2018-2026. These allocations should be presented by housing market area, and in that respect it would simplify a matter if the housing market area and the local plan areas were identical or compatible. The allocation should take account of all needs, including affordable housing. SPP3 allows a mechanism to bring forward allocations earlier if required i.e. to adjust phasing, without need for alteration or replacement of the plan.

Response:

Disagree. The Plan complies with the requirements of SPP3 and as outlined in the Report of Survey, takes account of all housing needs. Finalised Plan Proposal H1 is now presented by Housing Market Area.

Action:

Amend Proposal H1 (Schedule 1 of the Draft Plan) to Housing Market Areas.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Draft Plan Policy H2 and Schedules H2 and H3 are unnecessarily constraining on the subsequent local plans. The basis for the figures associated with both the strategic and medium scale areas is not explained anywhere and it is not clear if Fife Council has given detailed consideration to issues such as thresholds for infrastructure and services, or viability of development. In that case there seems no benefit in placing potential constraints for future masterplanning or local plan land allocations. The criteria for strategic areas are already stated in Policy SDA1, including a minimum size of 1000 houses, hence the medium scale areas are by definition less than 1000. It is therefore sufficient to identify locations without size ranges, leaving this to the local and master plan processes.

Response:

Finalised Plan Proposal H2 provides sufficient flexibility for Local Plans to direct development within these and other locations. The Report of Survey describes the process by which the Strategic Development Areas and Other Strategic Land Allocations have been identified.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

In view of the issue of phasing there needs to be recognition throughout the section that flexibility is needed to deal with change without constant formal alteration to the plan. There should be flexibility in terms of developers submitting proposals to vary the indicative capacities for growth areas. Regard should also be had to the requirements of SPP3 to provide for a range in choice in housing market areas, and at settlement level, and there can be justification for over-allocation to ensure a range of suitable opportunities. To assist with flexibility and to allow a mechanism in line with SPP3 for advancing phasing if required, Policy H1 and Schedule H1 should describe the allocations as minimum, recognising that the assumptions are made about wind fall urban capacity in small sites, and that there should be scope for local plans to react to market changes.

Response:

The Plan ensures sufficient flexibility to deal with change during the Plan period. Proposal H2 of the Finalised Structure Plan gives an indication of the locations and approximate scale of Strategic Development Areas and Other Strategic Land Allocations. Local Plans will give detailed consideration to the scale and siting of such development, subject to monitoring and review as necessary.

Comments noted. The pre-draft consultation for the Kirkcaldy and Mid Fife Local Plan is underway, with the draft Plan programmed for March 2007. Detailed issues of land allocation will be addressed through via the Local Plan and an integrated and phased masterplan prepared in consultation with local communities, landowners and stakeholders. Kirkcaldy East is identified in the Finalised Structure Plan as a Strategic Development Area, allocated for 2,500 houses. This allocation is an increase from the consultative draft Structure Plan that identified 1,750 houses over the same period. This change has been made in response to the comments received on the draft Plan. This provides sufficient flexibility for the Plan period and is subject to review by 2009.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Draft Plan Policy H3 can put flexibility into practise by ensuring that local plans identify reserve sites or long-term allocations, potentially forming part of the post-2018 supply, but available to be advanced if required. Draft Plan Policy H3 should have an additional criterion "identify a reserve land or areas of potential for future growth in order that any future shortfalls can quickly be addressed."

Response:

Disagree. Finalised Plan Policy H2 (Draft Plan Policy H3) provides sufficient flexibility for Local Plans to identify housing sites. The housing land requirement will be monitored through the Annual Housing Land Audit and subject to review as necessary.

Action:

No Change.

Comment No: 23

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Draft Plan Policy H4 should also contain the general provision in support of change to Draft Plan Policy H3 that "does not permit to the release of reserve land or future growth areas in advance of allocated sites without evidence of changed means."

Response:

Noted. Finalised Plan Policy H3 (Draft Plan Policy H4) and Proposal H2 of the Finalised Structure Plan provide sufficient clarity in relation to housing land allocations. Area Local Plans will give more detailed guidance on the phasing and scale of development.

Action:

No Change

Comment No: 24

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Homes for Scotland would point out that the modifications to the current approved structure plan removed the type of targets stated in Draft Plan Policy H5 on the basis that they were too broad should more appropriately be left to the local plans. Broad guidance on priority areas is included instead and a similar approach is suggested here pending a full review of the implications of the needs assessment and of the resources available to provide affordable housing.

Response:

Noted. However, disagree on Structure Plan approach. Affordable housing is a strategic issue in Fife requiring a detailed but strategic policy. Draft Plan Policy H5 now Finalised Plan Policy H4.

Action:

Draft Plan Policy H5 now Finalised Plan Policy H4.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Policy H5 is unacceptable in its present form, and fails to comply with PAN 74 in many respects.

Response:

PAN 74 was published after the Consultative Draft Structure Plan was approved. The Finalised Structure Plan and Supplementary Guidance have now taken this new advice into account.

Action:

Change Finalised Plan Policy H4 (was H5) in the light of PAN 74.

Comment No: 26

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Draft Plan Policy H7 should be amended to recognise that a minimum 5-year land supply is required in each housing market area. It should also reflect proposed changes to Draft Plan Policies H1, H3 and H4 as previously suggested, by recognising that proposed allocations are the minimum allocations and that maintaining adequate range in choice, and safeguarding reserve sites are reasons for additional allocations. Policy H7 should also note that the annual housing land review is a mechanism for monitoring the adequacy or otherwise of the land supply. The current bullet point is superfluous as the plan already promotes over allocation in Mid Fife. Bullet point three is not required as all policies require to be internally consistent.

Response:

Comments noted. Policy H5 of the Finalised Structure Plan (Draft Plan Policy H7) refers to a 5-year effective housing land supply being available in each Housing Market Area. Paragraph 3.42 refers to the Housing Land Review as the mechanism for monitoring land supply.

Action:

Finalised Plan Policy H5 amended .

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

In terms of transportation it would be useful if the Plan could clearly indicate if any modelling of the strategic land allocations has been done in terms of the capacity of the existing transport network to accommodate them or in terms of identifying new infrastructure necessary.

Response:

Transportation modelling has been undertaken in preparing the Finalised Structure Plan, as detailed in the Report of Survey. The work by SIAS Consultants has looked at existing capacity and the projects required to service the strategic development proposed.

Action:

No Change

Comment No: 28

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

The heading of Draft Plan Policy T3 is considered inappropriate, as it seeks to be founded on an intent to seek developer contributions.

Response:

Policy T3 of the Draft Structure Plan deals with Transport Assessments and Travel Plans, for which developer contributions may be sought, as appropriate. Draft Plan Policy T3 has been deleted and Finalised Plan Policy DC1 has addressed this issue

Action:

Delete Draft Plan Policy T3 and incorporate into Finalised Plan Policy DC1.

Comment No: 29

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Infrastructure

Comment:

Policy C1 is considered to have no effect, and should be redrafted to give Scottish Water firm guidance on the priorities in the Plan. In particular, it should make clear that the Plan's major strategic focus is in a named range of development locations, and that Scottish Water is directed to these locations in terms of future investment.

Response:

The strategy clearly indicates Fife's proposals for the next 20 years and the Action Plan identifies where and when new infrastructure is needed to ensure the strategy is implemented. Policy C1 has been revised and now incorporates Draft Plan Policies C2 and C3

Action:

Finalised Plan Policy C1 revised.

Forestry Commission Scotland - Central Scotland, Blackburn, Trevor - Clydebank

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Support for the Plan and for the policies developed from and supported by the Indicative Forestry Strategy (IFS).

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Forestry

Comment:

A number of minor additions/amendments are suggested in relation to urban forestry and funding for tree planting, including potential for targeted incentives.

Response:

Amendment agreed.

Action:

Suggested amendment to be incorporated into Indicative Forestry Strategy (In Report of Survey).

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Forestry

Comment:

It is very positive that the plan clearly identifies that Fife Council supports tree planting and there is, with such support locally, the potential for Forestry Commission to develop or find incentives to deliver more targeted seed planting on the ground. In other areas, such as in the Central Scotland Forest, targeted incentives in the form of locational premiums have been received very positively and that in effect mean delivering new planting in line with local need.

Response:

Support noted.

Action:

RSPB Scotland, Finney, Suki - Perth

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The section 'Safeguarding and Improving Fife's Environment' (paras 1.28-1.29) should include explicit reference to the protection of nationally and internationally designated sites.

Response:

This is achieved via Finalised Plan Policies ENV2, ENV3 and ENV4. (Draft Plan ENV4 - 6 inclusive.)

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

A commitment to protecting Fife's environment through sustainable development should be integrated into policy areas such as 'sustainable communities' and 'Growing Fife's Economy'.

Response:

Sustainable development is at the heart of the Finalised Structure Plan and there are a number of policies which seek to prevent Fife's environment.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Specific reference should be made in Chapter 1 to the Nature Conservation Act and the duty of the Council to further the conservation of biodiversity.

Response:

Draft Plan Policy ENV4 now Finalised Plan Policy ENV2 will be amended to mention this legislation.

Action:

Amend Finalised Plan Policy ENV2.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Vision for Fife in 2026 should include reference to the successful protection and enhancement of Fife's most important habitats and species.

Response:

Disagree. Vision is not a comprehensive list and cannot mention every topic.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Protection and enhancement of St Margaret's Marsh SSS1 and the Firth of Forth SPA should be included in the Rosyth Waterfront Masterplan (para 3.48).

Response:

This is a site specific issue more appropriate to the Area Local Plan and Master Plan.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Para 4.8 of the Draft Plan should include: "It must be demonstrated through a rigorous assessment that proposals will not have an adverse impact, directly, or cumulatively, on statutorily protected nature conservation interests, including specially protected birds".

Response:

Draft Plan Policy R3, now Finalised Plan R1, makes reference to protecting birds and the issue would be fully addressed in determining any applications.

Action:

No Change to Policy R1 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Last bullet point of Policy R3 of the Draft Plan should be reworded: "they are not located on regularly used flight paths of birds, or on or adjacent to important breeding or roosting sites or in areas where these are significant concentrations of birds".

Response:

Current wording is adequate and the issue would be fully addressed in determining any application. Draft Plan Policy R3 now Finalised Plan Policy R1.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Minerals

Comment:

The minerals section should include a commitment to avoid and minimise disturbance to sensitive sites and other areas where there may be a concentration of birds protected under Annex 1 of the Birds Directive. The importance of effective restoration should be stressed, in accordance with Fife Local Biodiversity Action Plan priorities.

Response:

These issues would be considered as part of EIA process evaluating mineral working proposals. Finalised Plan Policies ENV2, ENV3 and ENV4 would require to be considered.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Natural Environment

Comment:

Suggested rewording:

Policy ENV4: Nature Conservation - International Sites of Draft Plan.

Proposals for development or land use that may affect a European site (SPA, SAC), a proposed European site or a proposed/listed RAMSAR site will be subject to the most rigorous examination. Development or land use change not directly connected with or necessary to the management of the site and which is likely to have an adverse effect on the site (either individually or in combination with other plans or projects) will not be permitted unless the authority is satisfied that:

- i) there is no alternative solution; and
- ii) there are imperative reasons of overriding public interest of the development or land use change.

Where such as site hosts a priority habitat and/or priority species as defined by the Habitats Directive (92/43/EC), the only overriding public interest must relate to human health, public safety or beneficial consequences of primary importance to the environment. Other allowable exceptions are subject to the views of the European Commission.

Where such development does proceed, the authority will consider the use of the conditions or planning obligations to secure all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected.

Response:

It is intended to modify Draft Plan Policy ENV4 which is now Policy ENV2 of Finalised Plan has been modified, to include reference to Nature Conservation (Scotland) Act 2004.

Action:

Amend Policy ENV2 of Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Natural Environment

Comment:

Suggested rewording:

Draft Plan Policy ENV5: Nature Conservation - National Sites of Draft Plan.

Proposals for development in or likely to affect sites of national nature conservation importance (SSSIs, NNRs) will be subject to the most rigorous examination. Where such development may have an adverse effect on the site, it will not be permitted unless an environmental assessment has demonstrated to the satisfaction of the Council as planning authority that:

- i) the objectives of designation and the overall integrity of the designated area would not be compromised; or
- ii) there are no reasonable alternative means of meeting that development need and any adverse effects on the qualities for which the area has been designated are clearly outweighed by social or economic benefits of national importance.

Where development is permitted, the authority will consider the use of conditions or planning obligations to ensure the protection and enhancement of the site's nature conservation interest.

Response:

Disagree. Reference to Nature Conservation Enhancement contained in Policy ENV4 of Finalised Plan (Draft Plan Policy ENV5.). The Policy is the same as approved Structure Plan policy. The suggested rewording above is not concise and as specific as that in the Plan.

Action:

No Change as suggested.

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Natural Environment

Comment:

Draft Plan Policy ENV6: Nature Conservation Enhancement of Draft Plan.

We welcome the commitment to protect biodiversity outwith designated sites. We fully support the requirement that proposals likely to have an adverse impact on locally or regionally important sites must submit an ecological appraisal of the proposal detailing how any impact will be minimised or mitigated.

Response:

Support noted for protecting biodiversity outwith designated site. Any anticipated impacts of proposed developments would be evaluated via the Environmental Impact Assessment requirements. Draft Plan Policy ENV6 is now Finalised Plan Policy ENV4.

Action:

No Change to Policy ENV4 of Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Coast

Comment:

Para 4.45 should include "any development proposal likely to have an adverse impact on the Firth of Forth or Firth of Tay and Eden Estuary Special Protection Areas will not be permitted".

Response:

The areas mentioned in comment are protected via Finalised Plan Policy ENV2 and by policies in the emerging Area Local Plans and other nature conservation legislation.

Action:

No Change

Comment No: 13

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Coast

Comment:

The plan should include criteria for defining the developed and undeveloped coast and guidelines as to the types of development proposals that will be considered.

Response:

Policy guidance on the coast is now included in Core Local Plan policy and will be included in emerging Area Local Plans.

Action:

Scottish Wildlife Trust, Blow, Stephen - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

No support for a second Forth Road Bridge due to its potential impact on wildlife sites. Improved public transport systems should be pursued in preference to additional road provision, which is not a sustainable option. Support for the development of sustainable transport links.

Response:

The issues relating to nature conservation would be fully addressed and resolved via an Environmental Impact Assessment prior to the construction of the proposed new bridge and associated works. The second bridge is proposed to be multi-modal, making provision for both rail and road traffic.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Natural Environment

Comment:

Para 4.36 of Draft Plan should include a presumption against any development that would adversely affect the features of interest in International, National, Regional and Local sites.

Response:

Policies ENV2 and ENV3 of Finalised Plan deal with International and National sites whilst Core Local Plan policies deal with Regional and Local sites.

Action:

No Change to Policies ENV2 and ENV3 of Finalised Plan.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Natural Environment

Comment:

There is no reference to policy regarding agriculture and development of agricultural land.

Response:

This is addressed in Core Local Plan policy through Local Plans.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Natural Environment

Comment:

All developments, where appropriate and not only those which will impact on designated sites, should be required to include environmental enhancements to further the conservation of Fife's biodiversity. This should be linked with the Fife LBAP. Encourages the requirement for Environmental Impact Assessments and Sustainable Urban Drainage Systems, where applicable.

Response:

Policy ENV4 of Finalised Plan deals with Nature Conservation Enhancement. EIAs will be sought in appropriate circumstances. Policy on SUDS in Area Local Plans.

Action:

No Change

Comment No: 05

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Action Plan

Subject: Natural Environment

Comment:

At ENV5 of Action Plan, word "international" in purpose column should be changed to "national".

Response:

Agreed. Draft Plan Policy ENV5 now Policy ENV3 in Finalised Plan.

Action:

Action Plan wording amended.

Association for the Protection of Rural Scotland, Wright, Bill - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Unconvinced that there should be further incursion into the Green Belt area for St Andrews (reports from Alison Grant and David Tyldesley). Green Belt proposals should be drawn up for St Andrews, Dunfermline and other communities where edge of town opportunities for public amenity and landscape conservation would be enhanced. Particular support for recommendations for St Andrews Green Belt by David Tyldesley and policy in the approved Structure Plan 2002, that the "existing landscape should be preserved".

Response:

The boundary of the St Andrews Green Belt is delineated for first time in the draft St Andrews and East Fife Local Plan and the boundary of the Dunfermline Green Belt will be delineated in the Dunfermline and West Fife Local Plan. Policy ENV1 makes it clear that the delineation of Green Belt should ensure conservation objectives yet accommodate any appropriate new development.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

There is a need for restoration of local landscape designations in Fife. Recommend effective strategic recognition for regionally important landscapes such as the Lomond Hills and East Neuk, which are important for tourism and recreation.

Response:

Local landscape designations are under review. "Area of Great Landscape Value" designation may become obsolete during the life of the Plan. Local Plan reviews will consider landscape policy.

Action:

The Lauder Group, Lowe, Janet - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

Support for the development of Rosyth/South Fife as a key economic driver. The Lauder Group has a key role to play in contributing to economic growth.

Response:

Support and interest noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Support for the approach of Royal Dunfermline in regenerating Dunfermline Town Centre.

Response:

Support noted.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Potential exists for developing a much larger lifelong learning/higher education/business campus using existing college land and adjacent land, to develop a university presence in collaboration with the college's university partners. This mixed campus model is compatible with the development of DEX and should be included as an option in the Structure Plan.

Response:

Potential of these institutions to contribute positively to economy of Fife is noted. The Finalised Structure Plan identifies the need to attract a new higher education campus to substantially enhance the number of residents holding a degree. Detailed allocation of land is a matter for the Area Local Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Support a new secondary school in East Dunfermline, which could be co-located with the mixed campus model. The development of educational infrastructure in South Fife, particularly DEX, is under-represented in the Plan.

Response:

This is an issue for the Education Service to consider as part of School Estates Strategy. A new secondary school is identified for Dunfermline in Proposal DC1 of the Finalised Plan.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Overall, the Lauder Group suggests that the development of educational infrastructure in South Fife, particularly in the Dunfermline Eastern expansion area / East Dunfermline is underrepresented in the Structure Plan.

Response:

The development of the educational infrastructure is not a strategic planning led issue. Specific land requirements should be addressed via the Area Local Plan. Details of the local authority school provision is addressed in the DEX area and proposals for two primary schools are being progressed by Fife Council.

Action:

Scottish Environment Protection Agency, Caswell, Sean - Perth

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Policy SS1 states that the Council will "have regard" to the existence or anticipated availability of water and drainage. SEPA is opposed to large-scale development where public infrastructure is not available, due to increased risk of environmental harm. The policy does not make a clear statement that development promoted by the Plan will require public drainage infrastructure. The constraint of foul drainage capacity is not recognised and issues such as developer contributions appear only to relate to "community infrastructure" in para 3.6. Suggests that the issue of water and drainage infrastructure is included in either the supporting text or within Policy SS1.

Response:

Note support for Policy. Policy is designed to provide guidance for potential developers. Proposal is designed to indicate actions by Fife Council.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Water and Drainage

Comment:

Policy C1 and supporting text do not mention Sustainable Urban Drainage Systems (SUDS) or express any relationship between SUDS and nature conservation/enhancement. The commitment to SUDS at a strategic level is helpful in delivery.

Response:

SUDS are addressed as an Area Local Plan Core Policy.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Water and Drainage

Comment:

The plan contains no reference to flooding other than in Policy SS1, which is deficient as the Council has been working to produce supplementary guidance relating to flood risk and coastal development, where such development would be at risk. The protection of riverine habitats and ecological status of water bodies in relation to flooding and the requirements of the Water Framework Directive (WFD) and forthcoming Controlled Activities Regulations (CAR) are also key. A robust policy relating to the conservation of the aquatic environment, which considers the related issues of flooding, SUDS, habitat enhancement and protection and the WFD is required. Some of these matters are covered in policies ENV4, 5 & 6, but not sufficiently.

Response:

The issue of flooding is addressed in the Area Local Plans which implement Policy SS1 in detail. Nature Conservation issues are addressed by Draft Plan Policies ENV4, 5 & 6 (Finalised Plan Policies ENV2, ENV3 and ENV4) and any other emerging issues will be dealt with when the Development Plan is reviewed.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Waste Management

Comment:

Clarification of the difference between a policy and a proposal is required – Policy W1 and Proposal PW1. If they do not have the same status or weight, matters noted in the proposal should be incorporated within the policy statement. The policy is supported, but does not specifically direct local plans to provide spatial guidance for waste management facilities. Additional text suggested for Policy W1: "The local plans will identify sites consistent with the NWS" etc, to accord with NPPG10.

Response:

Support for Policy W1 noted. Policy W1 will be revised to provide strategic waste management guidance and Local Plans will provide more detailed policy guidance for assessing proposals in detail. Proposal PW1 will be deleted.

Action:

Delete Proposal PW1 and revise Policy W1 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Waste Management

Comment:

The positive correlation between waste management and employment opportunities is not apparent in Policy W1 and should be rectified.

Response:

Not considered necessary as this is applicable to a number of sections of the Plan. Policy W1 will be revised to provide strategic waste management guidance and Local Plans will provide more detailed policy guidance for assessing proposals in detail. Proposal PW1 will be deleted.

Action:

Delete Proposal PW1 and revise Policy W1 in Finalised Plan.

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Waste Management

Comment:

The potential of Westfield as a strategic site should be clearly stated so that it is not underestimated by potentially affected residents. May also be appropriate to note Westfield by name in Proposal W1.

Response:

Agree. Westfield has planning permission subject to conditions and legal agreement. Policy W1 will be revised to provide strategic waste management guidance and Local Plans will provide more detailed policy guidance for assessing proposals in detail. Proposal PW1 will be deleted. Preference will be given to Lochhead, Melville Wood and Westfield.

Action:

Delete Proposal PW1 and revise Policy W1 in Finalised Plan to include Westfield.

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Waste Management

Comment:

Policy W1 is general and mentions "waste" rather than municipal solid waste (MSW) and non-municipal solid waste. Propose that both waste streams are mentioned, so that the focus does not fall on MSW.

Response:

Policy W1 will be revised to provide strategic waste management guidance and Local Plans will provide more detailed policy guidance for assessing proposals in detail. Proposal PW1 will be deleted.

Action:

Delete Proposal PW1 and revise Policy W1 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Policy R3 of Draft Plan does not consider the potential for impacts on groundwater resources, in particular private water supplies. Suggest additional bullet: "they do not have a detrimental impact on groundwater resources or private water supplies".

Response:

Groundwater issues would be considered in relation to site-specific proposals. Draft Plan Policy R3 now Finalised Plan Policy R1.

Action:

No Change

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

The relationship between transportation and air quality should be included in the Finalised Plan, in particular that between large new settlements and associated travel routes. Inappropriate colocation of business/industrial/commercial and residential uses can lead to nuisance and a requirement for abatement measures solely because of proximity.

Response:

The issue of air quality in relation to transportation has been addressed in preparing the Finalised Structure Plan, primarily through the selection of strategic land allocations. Detailed land use allocations via the Area Local Plan: Master Plans and design briefs will address co-location issues to prevent nuisance and need for abatement measures.

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

SEPA supports Draft Plan policies E2, E3 and E4.

Response:

Support noted. These Policies will be incorporated into Local Plans and have been deleted from the Finalised Structure Plan.

Action:

Draft Plan Policies E2, E3 and E4 moved to Area Local Plans.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

SEPA support policies R1 and R2 of Draft Plan.

Response:

Support noted.

Action:

Policies R1 and R2 of Draft Plan are now included in Area Local Plans.

Comment No: 12

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Minerals

Comment:

SEPA supports policies M1, M2, M3 and M4.

Response:

Support noted.

Action:

No Change

Comment No: 13

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Brownfield Land

Comment:

SEPA supports Draft Plan Policy ENV2.

Response:

Support noted. Policy now renamed BL1 in the Finalised Plan.

Action:

Draft Plan Policy ENV2 now renamed Policy BL1 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Design Quality

Comment:

Draft Plan Policy ENV3 does not aspire to encourage energy efficiency and waste minimisation by good design construction practices. If this is in the Urban Design Guide, it should also be noted here; if not, then guidance should be included in the Structure Plan.

Response:

These issues are not directly land use planning issues and the policy relates to design, not construction practices. These issues would be addressed via the Community Plan, Take a Pride in Fife and the emerging Energy Strategy. Draft Plan Policy ENV3 will be included in Area Local Plans.

Action:

Draft Plan Policy ENV3 will be included in Area Local Plans.

Comment No: 15

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Density

Comment:

Housing density can be a barrier to achieving best practice in the development of SUDS. Draft Plan Policy H8 should include reference to matters relating to environmental benefits associated with open space, such as SUD structures and other habitat enhancement and creation opportunities.

Response:

Comment noted. These matters are addressed in appropriate Local Plan policies. Draft Plan Policy H8 now Finalised Plan Policy H6.

Action:

No Change

Comment No: 16

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Natural Environment

Comment:

SEPA supports policies ENV4, ENV5 and ENV6 of Draft Plan.

Response:

Support noted. Policies ENV4, ENV5 and ENV6 of Draft Plan are now Policies ENV2, ENV3 and ENV4 of Finalised Plan

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Forestry

Comment:

Inappropriate forestry development can have localised impact on ground and surface water resources. This is not noted in the policy although it is noted in the supporting text. SEPA suggests that a bullet point be added to this policy: "do not have an unacceptable impact on the local environment".

Response:

Agree comment on groundwater. Any tree planting proposal will be fully evaluated prior to approval and issues considered will include impact on groundwater. The process of evaluation ensures that there is no unacceptable impact, and therefore the suggested additional bullet point is unnecessary.

Action:

NFU Fife Area, Picken, John - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Rural Economy

Comment:

The needs of rural development in relation to leisure and tourism should be more fully addressed to reflect their development needs. Seeks policy support for the rural sector.

Response:

Proposals for rural leisure and tourism development will be fully evaluated in relation to the Policy framework set out in the Development Plan. The Strategy of the Finalised Structure Plan seeks to steer development to settlements unless there are overriding reasons for a rural location. Paragraph 3.19 of the Finalised Structure Plan has been expanded slightly.

Action:

Expand paragraph on Rural Fife.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Rural Economy

Comment:

Policy support is needed for development generated by farm business diversification which creates local employment.

Response:

Guidance on farm diversification is contained in Local Plans. However, wording of para 3.19 has been amended to specifically refer to agricultural diversification.

Action:

Amend para 3.19 *Comment No:* 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Policy in relation to energy crops, biomass, wind power, etc. should minimise the possible conflicts that may arise from their visual impact.

Response:

Visual impact issues would be fully considered for any renewable energy proposal.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Proposals should take account of the impact on the rural economy and business. Seeks clarification of what is/is not permitted in a Green Belt.

Response:

Policy ENV1 makes it clear that the delineation of Green Belt should ensure conservation objectives yet accommodate any appropriate new development. Detailed Green Belt land use policies are set out in the St Andrews and East Area Local Plan.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Rural Economy

Comment:

Energy can be obtained from crops for bioethanol, biodiesel and short rotation coppicing, wind power, and from farm bio mass plants, and furnaces. These will bring about the great changes in visual impact. There will be need to minimise conflicts that may arise from such change.

Response:

Contribution from Biomass is acknowledged in the Finalised Structure Plan. Each proposal for energy related development in rural areas will be fully assessed to ensure that its impacts are minimised.

Action:

Whitehead, Marilyn - Leven

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Areas of Great Landscape Value (AGLVs) should be excluded from the broad area of search for wind turbines. None of the landscape of East Fife is capable of absorbing such structures (Policy R3). Para 4.43 "Development should make a positive contribution to overall landscape quality" supports the exclusion of turbines from AGLVs.

Response:

Local landscape designations under review and the AGLV designation may be dropped during the life of the Plan. Approved Fife Structure Plan Policy N1 did not seek to prohibit development in AGLVs and a blanket ban is not a practicable planning approach. Draft Plan Policy R3 now Finalised Plan Policy R1.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Support for the opportunity presented by the Methil Energy Park for a bio-diesel or biomass plant, complemented by the growing of industrial crops in Fife's agricultural areas. This offers economic benefits to the rural economy and for Mid Fife.

Response:

Support for Methil Energy Park (now referred to as Energy Park Fife Scotland) noted.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Installation of smaller-scale wind turbines could be accommodated on brownfield sites where there is industrial use. Individual wind turbines should be encouraged for private houses.

Response:

Policy R1 of Draft Plan promotes development of renewable energy technologies on brownfield sites.

Action:

Policy R1 of Draft Plan now incorporated into Area Local Plans.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Suggests addition of a policy to make solar panels and solar slates mandatory for all new development.

Response:

There is currently no provision in Scottish Planning Guidance to facilitate such a policy. Should Policy guidance change, this would be addressed in Area Local Plans.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

There is no mention of Coastal Regeneration eastwards from Methil. The Draft Plan does not take account of the loss of the fishing industry in the East Neuk, where regeneration is needed, and there are opportunities to develop harbours for leisure sailing. Positive policies to promote the East Neuk harbour areas should be included in the Plan.

Response:

Concerns noted. The action required in the designated Coastal Regeneration Zone is oriented more toward land use and physical rehabilitation. The suggested changes can be achieved without a great deal of physical change and the Finalised Plan is supportive of the growth of tourism. Action will also be secured via the Local Plan process.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The Plan fails to demonstrate the need for the number of houses proposed (Policy H1) or the need to grow the population.

Response:

The Report of Survey outlines the justification for the Housing Land Requirement and population growth.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Supports all of the proposals in Proposal PT2 and urges that they be quickly advanced to support economic growth. Parking is a problem at all stations listed and should take precedence over facilities.

Response:

Support noted. Additional park and ride facilities are identified in Proposal PT1 of the Finalised Structure Plan.

Action:

British Wind Energy Association, Addersley, Kattie - London

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Insert word "wind" into first sentence of para 4.6 of Draft Plan, between "including" and "hydropower".

Response:

Agree.

Action:

Paragraph 3.62 of Finalised Plan makes mention of wind.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Amend for clarification the second bullet point of Policy R1 of Draft Plan: "minimise any adverse effects on the environment, to an acceptable level".

Response:

This is implicit.

Action:

Policy R1 of Draft Plan is now included in Area Local Plans.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

It is inappropriate and unnecessary to require proposals for wind turbines and wind farms to include the same level of assessment as per para 4.8 of Draft Plan, which would be prohibitive for small-scale developments. Recommends that this requirement be removed from the Draft Plan, as under EIA regulations, such assessment is statutory only for developments which exceed 5MW.

Response:

Scale of assessment would be appropriate to size of proposal and the location.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

In the case of wind farms, the requirements of para 4.8 of Draft Plan are reasonable, except for the 'landscape capacity assessment''. Request further information on what is meant by an LCA and whether any methodology is available. Suggests that this should refer to "an assessment of effects on landscape character", which could then be based upon the Fife Landscape Character Assessment.

Response:

Whilst approach is to direct proposals to areas consistent with Policy, cannot prevent application for development outside broad Areas of Search. These applications would be subject to equally rigorous appraisal and, if considered to be acceptable, would be supported.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Policy R3 of Draft Plan should reflect NPPG6 para 47 that the existence of broad areas of search should not exclude development outwith these areas where they can be accommodated in a satisfactory manner.

Response:

Whilst approach is to direct proposals to areas consistent with Policy, cannot prevent applications for development outside these areas. Draft Plan Policy R3 now Finalised Plan Policy R1.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

The first bullet point of Policy R3 of Draft Plan is superfluous and should be deleted.

Response:

No need to amend Bullet Point 3. Concept of proposal meeting an acceptable level is implicit. Draft Plan Policy R3 now Finalised Plan Policy R1.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Add "to an acceptable level" to the end of the second bullet point of Policy R3 of Draft Plan, for clarification.

Response:

This is implicit. Draft Plan Policy R3 now Finalised Plan Policy R1.

Action:

EnergieKonter UK Ltd, McLoughlin, Mick - Bond End, Knaresbrough

Comment No: 01

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Renewable Energy

Comment:

The comments on landscape capacity at para 6.33 of the Report of Survey, in support of paras 4.7 and 4.8 of the Draft Plan, suggest a need for a study to be conducted prior to the preparation/finalisation of the new local plans. This requires clarification and an indication of expected timescales and any consultation measures.

Response:

Further study on landscape capacity has been undertaken as an input into Area Local Plans and any other supplementary guidance as appropriate.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Object to the first criterion on Policy R3 of Draft Plan: "the landscape is capable of absorbing them". It is a fact that wind turbines are prominent vertical features that cannot be hidden in the landscape and which will always be visible. The test should be that they do not cause significant adverse visual and landscape impacts, as acknowledged in para 6.33 of the Report of Survey.

Response:

Impact of wind turbines on landscape an important factor to be evaluated. Agree to revise wording from "absorbing" to "accommodating". Draft Plan Policy R3 now Finalised Plan Policy R1.

Action:

Policy R1 of Finalised Plan has been amended.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Clarity is needed as to whether the current Customer Guideline on Renewable Energy will be superseded by the new Structure and Local Plans.

Response:

Customer Guidelines clearly state that they are interim guidelines, which will be superseded by the new Development Plan.

Action:

H J Banks & Company Limited, Hancock, Justin - Tow Law

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Minerals

Comment:

Policy M4 is onerous in requiring new developments to pass three tests, which may work within the context of existing NPPG16. However, proposed changes in SPP16 would result in the Policy creating a double requirement of environmental acceptability and benefits. Recommend that if SPP16 is adopted in its current draft form, Policy M4 is amended to require either environmental acceptability or local benefits.

Response:

Agree. Policy has been reviewed in light of revised SPP16.

Action:

Amend Policy M4 to reflect SPP16.

Confederation of UK Coal Producers, Brewer, David - Wakefield

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Minerals

Comment:

The section on minerals (para 4.9 - 4.15) is well-drafted and seeks to properly balance local and national needs with the need to minimise environmental impacts.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Minerals

Comment:

Policy M4 as drafted might be read to imply that both tests of environmental acceptability and local benefits should be met. To avoid possible misrepresentation, the word "and" between "settlements" and "secure" should be changed to "or".

Response:

Agree. Policy has been reviewed in light of revised SPP16.

Action:

Amend Policy M4 to reflect SPP16.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Policy objective at para 4.5 of Draft Plan should be redrafted as follows: "Encouraging the use of renewable energy and other low carbon technologies to reduce carbon dioxide emissions" to reflect that low carbon fossil fuel technologies are available.

Response:

The main thrust of UK Government planning for energy, as set out in the 2003 White Paper, is to move away from reliance on carbon-based energy sources. Proposals for low carbon dioxide emission fossil fuel based developments would be considered on their merits.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Suggests that the second sentence of the preface in Draft Plan is redrafted as follows: "We see the tensions that face communities, policy makers and industry in attempting to balance some of these issues and the consequence for this as we move into renewables and other low carbon technologies for power and energy".

Response:

The main thrust of UK Government planning for energy, as set out in the 2003 White Paper, is to move away from reliance on carbon-based energy sources. The Scottish Executive is very supportive of renewable energy technology and wishes planning authorities to plan positively for them. Proposals for low carbon dioxide emission fossil fuel based developments would be considered on their merits.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The avoidance of sterilisation of mineral deposits is welcomed deposits is welcomed, but might be extended to recognise that Opencast coal operations reduce, or even eliminate, the costs associated with the redevelopment of brownfield sites and stabilisation of old workings (Policies SS1 and SDA1, paras 3.1 - 3.6). Where it is necessary to develop a greenfield area, extraction of coal in conjunction with the development should also be considered where shallow coal exists.

Response:

Support for protection of minerals from sterilisation noted. Part of Policy M4 supports the principle of removal in advance of, or as part of site development process.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Brownfield Land

Comment:

In the prioritisation of the development of brownfield sites (para 1.27), it should be recognised that development costs, including stabilisation of mineral workings, can often be reduced, or avoided, in conjunction with Opencast coal extraction. This also avoids the sterilisation of reserves and accords with sustainability principles. Similar considerations apply under para 1.29, first bullet point.

Response:

Noted. Policy M4 supports mineral extraction to secure restoration of brownfield sites in appropriate circumstances.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The prioritisation of the development of brownfield sites is sensible. However, it should be recognised that the cost of developing brownfield sites, including the stabilisation of shallow mine workings, can be significantly reduced, or even avoided altogether, in conjunction with the open cast coal extraction. This also applies to the sterilisation of reserves and fully accords with all the principals of sustainability. In addition some more considerations apply under page 12 paragraph 1.9 first bullet point.

Response:

Part of Policy M4 supports the principle of mineral extraction to secure restoration of brownfield sites and prevent sterilisation of deposits.

Action:

The Coal Authority, Pickup, Kevin - Mansfield

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Supports the introduction of renewable energy, which is not in competition with coal, but should form part of a diverse and secure energy supply (para 6, Preface).

Response:

Support for renewables noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The strategic growth of population should take account of the coal resource and minimise sterilisation by carefully sited development.

Response:

Policy M4 supports in principle for removal of coal in advance of development where practicable.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Opencast coal mining has made a contribution to the development of facilities and infrastructure and is a source of local employment and wealth, which helps to sustain communities (paras 1.24-1.29).

Response:

Opencast coal operations is only one of a range of developments that contribute to sustaining communities, however, it is not a long term feature as the coal resources in any one area are finite.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Supports safeguarding the environment and suggests that, in designating Green Belt in Local Plans, it should be recognised that opencast coal mining within the green belt may be acceptable. The development of brownfield sites is also supported, provided that any economic coal that may exist beneath a site is recovered. Such coal may also help to fund the development and reduce the costs of stabilising shallow old workings.

Response:

Green Belt policy in Structure Plan does not place a total prohibition on opencast coal operations. Each proposal would be considered on its merits.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Preventing the sterilisation of mineral deposits (Policy SS1) can only be achieved by avoiding developing over, or immediately adjacent to, potentially economic coal deposits or by recovering the coal prior to development, which has the advantage of potentially providing income to offset development and infrastructure costs. The extraction of shallow coal and compaction of the replaced fill can provide a stable development platform. Expensive grouting of old workings should be avoided where coal recovery is technically, environmentally and economically viable.

Response:

Policy M4 makes provision for such operations in appropriate circumstances.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Supports Policy SS1 in relation to the avoidance of mineral sterilisation. Mining subsidence, gas and mine water are further relevant factors for consideration by Councils and developers, and consultation with The Coal Authority recommended on these matters.

Response:

Support noted. It is statutory requirement to consult with The Coal Authority in areas underlain by coal deposits.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Recommends that there is consultation with The Coal Authority in the selection of Development Areas under Policy SDA1. Opencast mining has contributed to infrastructure development and, provided there is an operational presence in Fife for the future, as with any other developer, it is expected that operators will continue to contribute to benefits for communities.

Response:

The areas identified in Policy SDA1 have been the subject of appraisal with regard to stability and the potential to stabilise the land via opencast coal operations. Identification of Mineral Stability Areas and Opencast Coal Extraction Feasibility Study can be viewed on www.fifedirect.org.uk.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The Coal Authority should be consulted on the potential sites identified in Draft Plan Policies E1, H3 and H4, so that sterilisation or working of coal and the effects of mine gas and minewater can be taken into account.

Response:

These proposals will be brought forward via Area Local Plans. The Coal Authority will be consulted at the appropriate time. Draft Plan Policies H3 and H4 are now Policies h2 and H3 in the Finalised Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Supports the development of renewable sources of electricity. However, the challenge of climate change must be met by a combination of actions, rather than just by renewable energy alone. Investment in clean coal technology can offer an alternative to renewable energy. The proposal (para 4.5) to "minimise the use of fossil fuels" misses an opportunity to promote the modernisation of Longannet Power Station or to consider underground coal gasification. Recommends that the Policy Objective is changed to: "Encouraging the use of renewable energy and clean coal technologies to reduce carbon dioxide emissions."

Response:

Support for reduction of greenhouse gases and use of fossil fuels does not prevent consideration of clean coal technology developments, which derive maximum utilisation of these fuels (e.g. as part of combined heat and power projects).

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

The use of biomass as outlined in Policy R2 is supported.

Response:

Support noted.

Action:

Policy R2 of Draft Plan now transferred to Area Local Plans.

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Para 4.7 of Draft Plan fails to recognise that increasing amounts of intermittent wind energy require an increasing amount of back-up energy, which is likely to be fossil fuel based.

Response:

Wind is fundamentally intermittent at any given location, which is taken into consideration when planning and developing wind energy proposals.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Minerals

Comment:

Policy M1 and paras 4.9-4.12, which relate to Fife's need for minerals or other market areas, should make it clear that coal has a UK market.

Response:

Such a definition would rule out export of coal and indeed of all minerals.

Action:

No Change

Comment No: 13

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Aggregates

Comment:

Policy M2 and para 4.13 should have regard to SPP16 in relation to contributions and the suggestion that trust funds could assist projects "throughout Fife." Concern that "encouragement" within Policy M2 could be misapplied as an absolute requirement.

Response:

Supporting text clearly states that each operation will be consulted on its own merit and policy will not be misapplied.

Action:

No Change

Comment No: 14

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Opencast Coal

Comment:

Concern that the last para of Policy M4 requires the application of both tests, where NPPG/SPP16 require that only one of the two must be met. Policy M4 should be adjusted to accurately reflect Scottish Executive guidance to ensure its accurate and effective application.

Response:

Policy has been reviewed in light of revised SPP16.

Action:

Alba Resource Recovery, Morin, KR - Gartlove, Alloa

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The importance of the Westfield site should be clearly recognised in the Plan in terms of: its contribution to sustainable waste management in Fife and surrounding Waste Areas; and its role in enhancing the environment through rehabilitation and reuse of a brownfield site, regeneration of Mid Fife and potential enhancement of the transport infrastructure.

Response:

Potential of Westfield has been further recognised in the Finalised Plan in the context of growing the energy sector in Fife.

Action:

Amend text.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Waste Management

Comment:

The Westfield Complex should be formally identified as a strategic waste management facility in Policy W1, which should be amended as follows:

An integrated network of waste management facilities to meet the Best Practicable Environmental Option set out in the Area Waste Plan will be provided by:

- the development of Lochhead as a strategic waste management facility to serve West Fife to accommodate appropriate waste management facilities; and/or
- the development of strategic waste management facilities at Westfield to serve Fife and potentially other waste strategy areas.

Provision will be made...

Response:

Agree. Westfield has planning permission subject to conditions and legal agreement. Policy W1 will be revised to provide strategic waste management guidance and Local Plans will provide more detailed policy guidance for assessing proposals in detail. Proposal PW1 will be deleted. Preference will be given to Lochhead, Melville Wood and Westfield.

Action:

Delete Proposal PW1 and revise Policy W1 in Finalised Plan to include Westfield.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Waste Management

Comment:

The existence of Westfield with planning permission, in addition to sites already existing at Lochhead and Lower Melville Wood, negates the need for additional Waste Management Facilities in Fife. The first section of Policy W1 should be amended as follows:

"There is no requirement for new waste management facilities in Fife. Any proposals for new waste management facilities will only be considered if a clear and specific need can be demonstrated. Such facilities should be located..."

Response:

Cannot prohibit development of other potential sites which could meet waste management requirements which cannot be satisfied by existing sites and Westfield. Policy W1 will be revised to provide strategic waste management guidance and Local Plans will provide more detailed policy guidance for assessing proposals in detail. Proposal PW1 will be deleted.

Action:

Delete Proposal PW1 and revise Policy W1 in Finalised Structure Plan.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Waste Management

Comment:

Paragraphs 4.20 and 4.21 of Draft Plan should be amended to reflect the current status and realistic future potential of Westfield. In particular, Westfield should be clearly identified as the facility to serve East and Mid Fife at the very least.

Response:

Agree. Westfield has planning permission subject to conditions and legal agreement. Policy W1 will be revised to provide strategic waste management guidance and Local Plans will provide more detailed policy guidance for assessing proposals in detail. Proposal PW1 will be deleted. Preference will be given to Lochhead, Melville Wood and Westfield.

Action:

Delete Proposal PW1 and revise Policy W1 in Finalised Plan to include Westfield.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Waste Management

Comment:

Paragraph 4.22 of Draft Plan should be amended to include the following:

"The Westfield site in Mid Fife offers the potential to develop a strategic waste infrastructure that will meet the long-term targets and by the use of the rail infrastructure, overcome proximity issues, to serve other Councils."

Response:

Agree. Westfield has planning permission subject to conditions and legal agreement. Policy W1 will be revised to provide strategic waste management guidance and Local Plans will provide more detailed policy guidance for assessing proposals in detail. Proposal PW1 will be deleted. Preference will be given to Lochhead, Melville Wood and Westfield. Text will be revised to take account of the rail link to the site.

Action:

Delete Proposal PW1 and revise Policy W1 in Finalised Plan to include Westfield.

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

An additional sentence should be added to the end of para 3.15 to reflect Westfield's potential contribution to the regeneration of Mid Fife:

"The Westfield site and associated developments also offers the opportunity to develop both mixed uses and services industries in Mid Fife and make a significant contribution to local economic growth."

Response:

The Westfield site has permission for a long term waste management facility. There is scope for other associated green business opportunities and an area is identified for an energy park development. Reference to a Green Business Park has been inserted into Proposal PE1.

Action:

Amend Proposal PE1 to include reference to Westfield.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Suggests addition to para 3.53 as follows:

"The Westfield development site offers the potential to develop new freight infrastructure in Fife. It will facilitate the movement of materials from road to rail, with the potential to support wider rail developments to assist both freight and passenger services both within Fife and the surrounding areas."

Response:

Suggestion noted. The road network linking Westfield with the surrounding area is not ideal for type of facility suggested. Development of the Westfield site will be considered in relation to Policy W1 of the Finalised Structure Plan.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Brownfield Land

Comment:

Suggests addition of new para after 4.31:

"The Council will work closely with the owners of Fife's largest derelict site at Westfield to secure a comprehensive restoration. Westfield offers the potential to contribute to a number of the proposed policies in this section, including Nature Conservation, Countryside Recreation and Public Access. The Council's aim will be to secure a restoration to enhance the landscape environment of Mid Fife and contribute to the wider regeneration of the area linked to the surrounding leisure and tourism infrastructure."

Response:

The derelict nature of the Westfield site has arisen due to the former permitted opencast site remaining unrestored. Fife Council supports the restoration of the site to a planned afteruse but does not consider the proposed new paragraph after 4.31 appropriate. 60 ha of land are allocated in Finalised Plan Proposal PE1 for a Green Business Park at Westfield.

Action:

Amend Finalised Plan Proposal PE1 to include reference to a Green Business Park at Westfield.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Waste Management

Comment:

It is suggested that the second bullet point of proposal PW1 be revised to read

" the development of strategic waste management facilities at Westfield to serve Fife and potentially other waste strategy areas".

Response:

Agree. Westfield has planning permission subject to conditions and legal agreement. Preference will be given to Lochhead, Melville Wood and Westfield.

Action:

Delete Proposal PN1 and revise Policy W1 to include Westfield.

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Waste Management

Comment:

Propose that this first section of Policy W1 be revised to read:

"There is no requirement for new waste management facilities in Fife. Any proposals for new waste management facilities will only be considered if clearer specific need can be demonstrated. Such facilities should be located..."

Response:

Disagree. Cannot prohibit development of other profitable sites which could meet waste management requirement which will not be satisfied by existing facilities and Westfield.

Action:

Revise Policy W1 and delete Proposal W1.

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Waste Management

Comment:

Paragraph 4.22 should be amended by the addition of the following: "The Westfield site in Fife offers the potential to develop a strategic waste infrastructure that will meet the long term targets by the use of rail infrastructure and overcome proximity issues, to serve other councils."

Response:

Agree. Westfield has planning permission subject to conditions and legal agreement. Text will be revised to take account of the rail link to the site.

Action:

Amend Finalised Plan to mention rail link.

Scottish Coal, Beebe, Stephen - Gartlove, Alloa

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Wishes to open dialogue on the issue of recognising the potential of the Kelty Land Art proposal as a development theme for a mixed use initiative in and around St Ninians and Loch Fitty.

Response:

This is an issue for consideration as part of the exercise of producing the Area Local Plan.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Rural Economy

Comment:

The Structure Plan should reflect the new development impetus for rural areas outlined in SPP15 – Planning for Rural Development and PANs on Rural Diversification and Housing in the Countryside. It should also give greater emphasis to development in the rural areas, especially where linked to existing regeneration priorities.

Response:

It is considered that the Finalised Structure Plan Policy Framework fully reflects the guidance contained in SPP15, particularly the provision of Paragraph 9. Paragraph 3.19 of the Finalised Structure Plan has been expanded slightly.

Action:

Expand paragraph on Rural Fife

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Opencast Coal

Comment:

Seeks clarification from the Structure Plan on the issue of coal extraction and development:

- 1. The opportunity for coal extraction and ground stabilisation in advance of development such as settlement extensions; and
- 2. The opportunity to realise the development potential of sites that are in their own right viable opencast coal operations and in terms of after-use, marketable built development opportunities.

Response:

Policy M4 provides guidance on issue 1. The after use of sites is more appropriately addressed by land use allocation in Local Plans.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Opencast Coal

Comment:

Policy M4 is welcomed in principle. Suggests that there are opportunities for a proactive approach to larger scale rural development opportunities within areas of shallow coal deposits.

Response:

Support for Policy M4 noted. Development opportunities will be identified in Local Plans and any potential for removal of coal by opencast methods in advance of development will be fully evaluated.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Although the objective of encouraging renewable energy as an alternative to fossil fuels is welcomed, there needs to be recognition that fossil fuels, including coal, will continue to have a critical role in meeting the energy needs of the UK generally and Fife locally.

Response:

Support for encouraging renewable energy noted. Structure Plan does not rule out contribution of fossil fuel to energy supply system.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Minerals

Comment:

It should be noted that the Fife Coalfield remains of strategic importance to the supply of coal for electricity generation purposes, particularly given the proximity of Scotland's two coal fired power stations and a number of other factors. In view of the importance of coal it is considered that there should be recognition in the plan that, from a development control point of view, direct and indirect sterilisation of mineral deposits is a matter for consideration at the planning application stage.

Response:

Stated Policy objective is to protect potential mineral deposits from sterilisation by development. The Coal Authority is consulted on all Development Plan Proposals and all planning applications in coal bearing areas.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Minerals

Comment:

Scottish Coal has no objection in principle to the introduction of Policy M2 which establishes contributions to mineral trust funds. However it should be made clear as to how a single Fife-wide trust would operate and what input communities in proximity to mineral sites would have on distribution of funds to ensure that those communities most affected would benefit from the contributions.

Response:

Support for principle of Policy M2 noted. Detail is not appropriate to Structure Plan and will be addressed when Minerals Subject Local Plan is reviewed.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Opencast Coal

Comment:

Paragraph 4.11 states that areas of opencast coal are defined in the Draft Structure Plan. However, unlike the approved Structure Plan, the key diagram accompanying the draft text seems to omit the identification of such areas of search, which is not consistent with NPPG16 and its emerging replacement SPP16.

Response:

Areas of Search for opencast coal are identified in greater detail in Fife Minerals Subject Local Plan. See paragraph 3.62 of the Finalised Structure Plan.

Action:

No Change

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Opencast Coal

Comment:

Draft Plan makes a requirement that coal operations must not cause unacceptable environmental damage and secure clear community benefits. This is not consistent with NPPG16 or its emerging replacement MSPG16, and the word 'and' between bullet points in policy M4 should be replaced with 'or'.

Response:

Policy has been reviewed in light of revised SPP16.

Action:

Revise Policy M4.

Scottish Coal, Ortlep, Colin - Gartlove, Alloa

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Opencast Coal

Comment:

Clarification needed of wording "commonly deemed unacceptable" in Action Plan. Suggest rewording - "Direct proposals to more acceptable locations and avoid unacceptable environmental impacts."

Response:

Agree to suggested rewording.

Action:

Amend wording.

British Aggregates Association, Bird, Richard - Doune

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Aggregates

Comment:

Generally speaking the British Aggregates Association is encouraged by the recognition of the importance of minerals to the economic growth, particularly when it applies to construction aggregates. The notes on aggregates landbanks and the need to make sure that aggregate reserves are not sterilised by other developments are acknowledged and appreciated.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Aggregates

Comment:

It is considered, however unfortunate, that the plan tends to lump all mineral operations together as if they had the same impact on local communities. It is considered that the winning of construction aggregates is very different from opencast operations in terms of scale and length of operations. There is no positive mention about the nature conservation afteruses of aggregate extraction sites nor is there any mention of trade association restoration guarantee funds which mean that Local Authorities will not have to meet the cost of restoration in the unlikely event of an aggregate company failing.

Response:

The Finalised Structure Plan provides a strategic overview of mineral operations whereas the adopted Minerals Subject Local Plan provides much more detail. It is accepted that in some circumstances, nature conservation benefits can accrue from extraction but this depends on the afteruse. The issue of restoration bonds / guarantee funds is addressed in the Minerals Subject Local Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Aggregates

Comment:

BAA strongly objects to section paragraph 4.13 and Policy M2 which propose a royalty to be paid to a Fife Minerals Trust Fund as the aggregates industry currently pays £1.60 per tonne to the Aggregate Levy Sustainability Fund. BAA therefore request that references to the Minerals Trust Fund as it applies to construction aggregates be withdrawn from the Structure Plan. It is considered that it is unacceptable to refer to any contribution as being voluntary as the fact that they are noted in the Draft Plan in the first place tends to give a false impression.

Response:

Objection noted. Any contributions would be agreed, taking account of Aggregates Levy on a site by site basis.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Aggregates

Comment:

It is considered that the reference to the Minerals Trust Fund also tends to contradict the impression in paragraph 4.4 that the Plan is seeking a response from the industry to alleviate the short fall in the ten year landbank of crushed rock.

Response:

Disagree. The landbank approach is an enabling one allowing the industry to establish a landbank of mineral resources.

Action:

Quarry Products Association, Sheridan, John - Glasgow

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Minerals

Comment:

It is presumed that all the effects of mineral working will be taken in to account prior to the determination of any planning application and there should be no significant adverse affects of extraction. In addition paragraph 4.10 should also highlight the importance of the minerals industry to the needs of society, particularly set in the overall context of the aspirations of the development strategy for Fife.

Response:

In an ideal situation this should be the case. However, on occasion operators' actions fall below required standards, giving rise to unacceptable impacts. The development strategy requires inputs from a whole spectrum of industries to ensure its implementation, of which the aggregates industry is only one.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Minerals

Comment:

It is considered that the significance of other non-aggregate minerals such as silica sand should be recognised within Policy M1, as such industrial minerals are nationally important, contributing to the country's economy.

Response:

Noted. Policy M1 is equally applicable to silica sandstone.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Aggregates

Comment:

Within Policy M1 the expression "more sustainably-sourced alternative materials" is in need of clarification, while the limitations of secondary and recycled materials also need to be recognised. For example, while glass can be recycled, it requires sweetening with even higher quality silica sand.

Response:

Fife Structure Plan promotes the use of recycled or secondary sources as an alternative to other mineral resources. However, in promoting these materials there is recognition of the fact that in some instances recycled materials may not satisfy demanding specifications. It is the responsibility of the applicant to demonstrate that the need for a specific mineral deposit cannot be met from alternative sources.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Aggregates

Comment:

It is considered that paragraph 4.13 and Policy M2 should be deleted as the Quarry Products Association is not aware of any non-coal operators who are prepared to pay a royalty. UK Government already imposes an Aggregates Levy on the industry and money from the fund has been spent in Fife.

Response:

Noted. Any contributions would be agreed, taking account of Aggregates Levy, on a site by site basis.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Minerals

Comment:

Policy M3 should state "at least" ten year landbank in order to satisfy Scottish Executive guidance and concur with the preamble in paragraph 4.14.

Response:

Policy M3 does not cap landbanks at a ten year supply.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Minerals

Comment:

Paragraph 4.15 and Proposal PM1 should also include preferred areas and site-specific allocations. In addition, the Minerals Subject Local Plan should also incorporate provisions for industrial silica sand.

Response:

These issues would be more appropriately dealt with through the Minerals Subject Local Plan Review. Proposal PM1 has been deleted, in the interest of brevity, but a commitment to reviewing the Plan is set out in the supporting text.

Action:

Proposal PM1 has been deleted.

RMC Materials Ltd, O'Sullivan, J. M. - Thorpe, Egham

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Minerals

Comment:

With regard to paragraph 4.10 and to safeguarding local communities from the significant adverse affects of extraction, well located quarries with sensitively designed working schemes may, in practice, cause little impact.

Response:

Agreed. However, on occasion, operators' actions fall bellow required standards giving rise to unacceptable impacts.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Minerals

Comment:

The minerals policy objectives in paragraph 4.11 are generally appropriate, as is Policy M1 in general terms. However, clarification is needed as to what "more sustainably sourced" means in practice. It should be pointed out that secondary and recycled materials can have limitations on their suitability.

Response:

Support for Policy objections and Policy M1 noted. Where practicable, recycled materials rather than mineral resources should be used. However, it is recognised that quality issues can arise and that recycled materials may not satisfy demanding specifications. It is the responsibility of the applicant to demonstrate that the need for a specific mineral deposit cannot be met from alternative sources.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Aggregates

Comment:

Paragraph 4.13 is appropriate and Policy M2 is objected to. Aggregates Levy has already funded substantial awards in Fife under the Community Renewal Environmental Scheme.

Response:

Objection noted. The aim of establishing a Fife-wide fund is to generate funding for works beyond the areas immediately affected by mineral operators i.e. only those areas in close proximity to the extraction operations. It is considered the benefits should be extended to those who may be remote from mineral operations yet are affected, for example, by an increase in heavy vehicle traffic.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Minerals

Comment:

Policy M3 on construction aggregates is illogical in stating that proposals will be supported only where their production does not exceed the assessed landbank requirement. The text in paragraph 4.14 confirms landbanks should be equivalent to at least ten years' supply, which is also confirmed by paragraph 6.36 of the Report of Survey.

Response:

Policy M3 does not cap landbanks at a ten year supply.

Action:

WBB Minerals, Horsley, Nick - Sandbach

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Minerals

Comment:

Suggests that, in order to offer a more balanced interpretation of the potential effects of mineral extraction, paragraph 4.10 is reworded as follows "Mineral working is an important economic activity which contributes to the needs of society. However, it consumes finite resources. It has the potential to affect the environment and communities in both a positive and negative way. Restoration, aftercare and afteruse of sites are therefore important planning considerations. The Structure Plan seeks to balance the need for minerals with the importance safeguarding local communities from the potentially adverse effects of extraction and the protection of the environment."

Response:

Disagree. Consider statement in paragraph 4.10 (para 3.58 of Finalised Plan) to be reasonable.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Minerals

Comment:

Minerals reserves and resources within Fife, particularly Silica (industrial sand), are nationally important minerals which contribute to the country's economy as well as that of the UK as a whole. The policy objectives do not recognise this and the third objective for minerals should be revised to read: "ensuring that the scale and location of minerals extraction is sufficient to meet the needs of the Local, Regional and National economy and can, where necessary contribute to wider market area needs."

Response:

Policy M1 acknowledges need for minerals extracted in Fife to meet a wider market area.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Minerals

Comment:

Policy M1 would appear to focus specifically on provision of aggregates for local markets and does not take into consideration the importance of industrial minerals such as silica sand.

Response:

Disagree. Policy M1 covers all minerals including silica sand.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Aggregates

Comment:

The statement that mineral operators are prepared to provide, on a voluntary basis, funding for compensatory works through a payment of a royalty based on the amount of material won from their operations is strongly contested. Significantly increased costs such as energy, transport and the cost of processing plant constrict profitability for non coal developments. Such a comment as that quoted demonstrates a lack of understanding of the cost of mineral operations and associated developments, including restoration and mitigation. Preamble to the Policy M2 makes no mention of the Aggregates Levy Fund which itself meets fully the objective described in the text of the Plan.

Response:

Disagree. Aggregates Levy Funds can only be used in close proximity to extraction sites and address the effects of mineral extraction sites. It is considered that the benefits should be extended to those who may be remote from mineral operations yet are affected, for example, by an increase in heavy vehicle traffic.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Aggregates

Comment:

Policy M2 should be deleted as it amounts simply to a development tax. It makes no mention of the Aggregates Levy Fund which itself meets the objectives of the Policy. Fife has benefited significantly from schemes submitted to the Scottish Executive and Forward Scotland as a result of the introduction of the levy.

Response:

Objection noted. Aggregates Levy Funds can only be used in close proximity to extraction sites and the effects of mineral extraction sites. It is considered that the benefits should be extended to those who may be remote from mineral operations yet are affected, for example, by an increase in heavy vehicle traffic.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Minerals

Comment:

It is considered that the last sentence of Policy M3 should be revised to read "...and at least a ten year landbank will be maintained at all times" in order that the Policy fully accords with the Scottish Executive guidance and the preamble to the Policy in paragraph 4.14.

Response:

Policy M3 does not restrict landbank to 10 years.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Minerals

Comment:

Fife Council should address the issue of site specific allocations and preferred areas as well as areas of search.

Response:

Areas of Search are identified in detail in the Fife Minerals Subject Local Plan. A site specific allocation is not practicable as it would imply a full assessment of the site equivalent to that undertaken in preparing a planning application.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Minerals

Comment:

It is suggested that Proposal PM1 should be revised as follows: "Fife Council will review the Minerals Subject Local Plan by the end of the year 2007 in order to reflect change in circumstances and roll forward at least a ten year landbank for construction aggregates". The Proposal needs to properly reflect landbank requirements for the provision of aggregates. In addition, the Structure Plan must make appropriate provision for non-aggregate and non-energy minerals such as silica sand.

Response:

These matters are best addressed as part of the review of the Fife Minerals Subject Local Plan. Proposal PM1 has been deleted in the interests of brevity, but a commitment to reviewing the Plan is set out in the supporting text.

Action:

Proposal PM1 has been deleted.

Smith, Graham - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

The quantity of material relating to so many new plans requiring consideration over a relatively short period of time was excessive and does not permit adequate public scrutiny.

Response:

The material was inter-related and it was important that it was available at the same time. The consultation period was in excess of the statutory requirements and late submissions were accepted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

There is a lack of an effective Green Belt around St Andrews and previous recommendations for the Green Belt have been completely ignored. A previous Study in 1998 stated that St Andrews is at its landscape capacity and that no major expansion should take place. What has changed? It is suggested that the Green Belt is clearly just ignored and the Plan is profit-driven and just completely ignores local concerns and is likely to cause considerable damage to St Andrews' world class reputation.

Response:

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which also identify the boundaries.

Action:

Policy and text amended.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

It is considered that an extra 1800 houses would make things in St Andrews a great deal worse because currently:

- a) St Andrews is almost gridlocked and suffering from severe traffic congestion which has become considerably worse since the 1998 Study which stated the quality of the town's environment was already under threat from traffic congestion
- b) Madras College is suffering from severe overcrowding
- c) the existing health care provisions are under severe pressure and there is already significant uncertainty over a new hospital
- d) the existing flooding issues related to the Kinness Burn and sewage issues remain completely unresolved.

It is considered ludicrous to suggest extra housing when the plans do not detail how the existing problems will be resolved and again strongly suggest that these proposals are just developer-led.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Coast

Comment:

The omission, from the Draft Structure Plan, of any mention of protection against development of the Fife coastline, which was previous policy, gives rise to concern.

Response:

Policies dealing with the coast are now Core Local Plan Policies and will be included in emerging Area Local Plans.

Action:

Stinzy, Frederique - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Coast

Comment:

The omission, from the Draft Structure Plan, of any mention of protection against development of the Fife coastline, which was previous policy, gives rise to concern.

Response:

Policies dealing with the coast are now Core Local Plan Policies and will be included in emerging Area Local Plans.

Action:

Marks, Patrick - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

It is considered that the draft Structure Plan does not take account of Local Agenda 21 or Community Planning. It is considered that the main aim of Community Planning, apart from involving other public bodies in the planning process, is to involve the local population. However, there appears to be something of a presumption in planning for Fife in favour of large speculative projects and yet again making the planning process difficult for ordinary citizens.

Response:

The consultation exercise was designed to make the Plans available to everyone and every opportunity was given for people to respond and make their views known. The aim of the Development Plan approach is for a Plan led system in order to avoid being driven by a speculative approach.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

It is considered that up to 1800 new houses in St Andrews will cause huge increases in traffic and will detrimentally affect the environment of the southern and western side of the town. Traffic congestion will continue to increase, plus put pressure on local services such as schools, dentists, doctors and shops. Where are proposals to make any new housing greener? Developers care little about sustainable development and there appears to be little evidence in local developments in St Andrews of solar panels and other forms of renewable energy being incorporated in the housing.

Response:

The specific allocation of land for future development is a function for the Local Plan process. Full account has been taken of the important requirements and these will be addressed in detail via Local Plans, Master Plans and development briefs. These are currently no powers to require developers to incorporate renewables in house design but site layouts that take full advantage of solar passive gains can be specified in masterplans and design briefs.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

It is considered that Fife Council should be developing more sustainable transport, including cycle routes for school pupils, and a rail link to Leuchars. It is considered that pedestrianisation in St Andrews town centre is an excellent idea.

Response:

The Local Transport Strategy and Area Transport Plans, together with the Core Paths Plan, address sustainable transport options. Proposal PT1 of the Finalised Structure Plan includes reference to options to connect St Andrews to the rail network. Support Noted.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

A comprehensive Green Belt needs to be created as soon as possible to prevent development along the southern hillside. In addition, there is a concern that some areas of nature conservation value may be damaged by inappropriate development.

Response:

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries.

Action:

Policy and text amended.

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Building 1800 houses in order to get perhaps 270 affordable homes is not acceptable.

Response:

The allocation of new housing is not for the sole purpose of delivering new affordable housing. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Housing waiting list for St Andrews alone is more than the proposed numbers for affordable housing. The town needs housing for its manual/semi-skilled - skilled workforce of young professionals over 4 to 5 bedroomed town mansions.

Response:

Waiting list information has to be used with caution. The planning system will only deliver part of the overall need for affordable housing. The local Housing Strategy identifies other actions for delivery of affordable housing.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Affordable housing must be maintained as affordable to prevent the abuse that takes place with a current right to buy or there will be very little housing of the above types for workers/residents.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The University needs to provide residences for students and should not be allowed to expand if accommodation is not available.

Response:

Noted. The Council cannot require a University to provide residences. This issue is more properly addressed by the St Andrews and East Fife Local Plan.

Action:

Marks, Averill - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Our Structure Plan does not take account of Local Agenda (LA21) which involves precautionary planning for future generations and community planning, which came into force in Scotland in 2003. This has as a main aim apart from involving other public bodies in the planning process of involving the local population.

Response:

The consultation exercise was designed to make the Plans available to everyone and every opportunity was given for people to respond and make their views known. The aim of the approval to the Development Plan is for a Plan led system in order to avoid being driven by a speculative approach.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

It is considered the proposed expansion of St Andrews of up to 1800 houses will cause huge increases in traffic and will detrimentally effect the environment at the southern and western sides of the town. Traffic congestion will continue to increase as will pressure on local services such as schools, health care facilities and shops.

Response:

It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

It appears that the requirement for a new school in the Tay Bridgehead area has been completely ignored in the Structure Plan. In addition there appears to be little information about the School Estate Strategy. It seems premature to produce a Structure Plan before results of this exercise are available to the public.

Response:

Fife Council is undertaking a review of the delivery of education services for the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

It is considered that the Council should be developing more sustainable transport including designated cycle routes to enable school pupils to cycle to school and developing a rail link to Leuchars. It is considered that pedestrianisation of the town centre is an excellent idea.

Response:

The Local Transport Strategy and Area Transport Plans, together with the Core Paths Plan, address sustainable transport options. Proposal PT1 of the Finalised Structure Plan includes reference to options to connect St Andrews to the rail network. Support Noted.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

A comprehensive Green Belt needs to be created as soon as possible to prevent development along the hillside to the south of St Andrews.

Response:

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries.

Action:

Policy and text amended.

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

Hospital could be located in the St Leonard's fields area.

Response:

The need for a new hospital was addressed in the Fife Structure Plan (Approved 2002). The site is not a strategic planning issue. The Approved Structure Plan 2002 stated that a site would be identified and progressed by the appropriate Local Plan. The site proposed in the Local Plan is the one preferred by NHS Fife.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

It is agreed that affordable housing is needed. However building 1800 houses in order to perhaps get only 270 affordable homes is not acceptable.

Response:

The allocation of new housing is not for the sole purpose of delivering new affordable housing. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The University needs to provide residences for students and should not be allowed to expand if accommodation is not available.

Response:

The Council cannot require a University to provide student residences. This issue is more properly addressed by the St Andrews and East Fife Local Plan.

Action:

Quinn, Elizabeth - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Object to the flood of documents and for the short timescale for public consultation. Whilst the documents interrelate there is no definition provided for affordable housing or of St Andrews World Class though both are referred to extensively in these documents. In addition Fife Council provided no explanatory map and little guidance.

Response:

Objection noted. Affordable housing is defined in the Structure Plan Glossary. The text in paragraph 1.16 of the Draft Structure Plan has intended to make clear the St Andrews World Class proposal. There may be some confusion arising from the fact that there is an organisation called St Andrews World Class which is a partnership led by Scottish Enterprise Fife and including Fife Council, other businesses and local organisations. The Structure Plan is not an ordnance based document and key proposals must be depicted on the Key Diagram.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Seriously concerned about and doubt Fife Council's economic assumptions are correct. There are no assurances that businesses will locate in Fife which has business start-up below the national average. In addition it is considered that Fife Council overemphasises the role of St Andrews as an economic driver for Fife which may seriously damage and jeopardise the uniqueness and the quality of this medieval town.

Response:

Concerns noted. Background information is provided in The Report of Survey. St Andrews has a positive role to play in providing for employment opportunities which can be achieved whilst protecting its assets of uniqueness and quality.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

It is not clear how Fife Council's desire to grow Fife by 20,000 people in 20 years will be achieved in face of a decreasing Scottish population by providing 3500 homes and employment facilities. It is considered this is optimistic at best.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action

No change in planning for 5% growth.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

It is considered that there is no way St Andrews' infrastructure could support the proposed 1800 houses. It is considered that they can only have a negative impact on traffic which is presently at gridlock, the schools (which are now over subscribed), health care facilities and the town drainage system.

Response:

It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Documents produced by Fife Council in October 1998 rejected major housing developments in St Andrews stating that St Andrews is at its landscape capacity and no major expansion should take place where this would result another unacceptable impact on the quality of the town environment. It is not clear why the 2002 Approved Fife Structure Plan set for zero requirement rate for housing land yet the new Plan proposes the allocation of 1800 houses.

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

It appears that the University is changing its strategy, i.e. reducing the number of under-graduates while increasing the number of post-graduates. This will require further research facilities and it is considered that the development of new facilities at the University should not be at the cost of additional houses to provide the provision of infrastructure to support them.

Response:

Planning gain must relate to the development proposed therefore little opportunity to "subsidise" University from new housing developments in St Andrews area.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Currently there are 419 people on Fife Council's waiting list for St Andrews. It is considered that Fife Council should be building Council houses on the land it already owns rather than relying on developers to provide this. In real terms, developer led housing will be no solution. Surely, due to the importance of St Andrews in Fife, it is considered that a request should be made to Communities Scotland for a large slice of the £1.3 billion recently allocated by the Scottish Executive over the next three years to provide affordable housing.

Response:

There are also households in need who are not on the Council's waiting list. Fife Council is already using its own land holdings to facilitate the provision of affordable housing. Provision of affordable housing though the planning system has a contribution to make in meeting the overall shortfall, although it cannot address it in entirety. Fife Council and Communities Scotland are continuously reviewing land availability in the St Andrews area and funding has been provided for Kingdom Housing Association to identify future opportunities for housing. An appropriate proportion of Communities Scotland's future budget will be allocated to housing associations for investment in Fife and in the St Andrews area.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

It is considered that the Green Belt as proposed fails to deliver that mandated by the Scottish Executive as set out in the 2002 Fife Structure Plan. Large scale development would irretrievably damage the landscape setting and medieval heritage of the town. It appears that Fife Council has completely ignored the Landscape Assessment Study produced by its expert in March 2003 and the Green Belt boundary proposals contained therein.

Response.

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries.

Action:

Policy and text amended.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Sustainability

Comment:

It is considered that turning St Andrews into more of a commuter town for Dundee and Edinburgh is in contravention of Fife Council's environmental and sustainability policies to reduce carbon emissions in line with the Kyoto Accord.

Response:

It is considered that St Andrews has the potential to play a significant role in the creation of employment opportunities which would contribute to reducing commuting.

Action:

Wilson, Danielle - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Sustainability

Comment:

It is considered that turning St Andrews into more of a commuter town for Dundee and Edinburgh is in contravention of Fife Council's environmental and sustainability policies to reduce carbon emissions in line with the Kyoto Accord.

Response:

It is considered that St Andrews has the potential to play a significant role in the creation of employment opportunities which would contribute to reducing commuting .

Action:

Murray, Margaret - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The need to retain and improve landscape settings as set out in Policy SS1 is a weak statement. It should be strengthened to include protection for Areas of Great Landscape Value and Areas of Historic Importance.

Response:

Noted. Archaeological features are protected via bullet point three of section 2 of Policy SS1 and other Core Local Plan Policies. Area of Great Landscape Value designation under review and may be replaced.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The Schedule H3 allocation for housing for St Andrews is based on unclear population data. In particular it is not clear whether figures include or exclude students. St Andrews is proposed to have medium-scale growth. However, the proposals will deliver a large scale development for the town. The Fife Structure Plan 2002 showed a zero housing shortfall up to 2011 and the Strategic Study of 1998 stated that St Andrews was at its landscape capacity yet there is no explanation of how these have changed.

Response:

The justification for new development is contained in the Report of Survey. The 1998 Study was to inform the replacement for the 1994 Structure Plan, which was approved in 2002. Significant changes have since taken place which require the provision of land for new development for the period 2006-2026.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The proposals of Draft Plan Policy H5 will be totally ineffective under present national legislation as there is minimum restraint on sale of affordable housing. The policy should be strengthened to make it workable.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on affordable housing. Draft Plan Policy H5 now Finalised Plan Policy H4.

Action:

Draft Plan Policy H5 now Finalised Plan Policy H4.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

With regards to Policy ENV1 it should remain clear that Green Belts should be designated under present and future Green Belt planning guidance.

Response:

Green Belt has been delineated taking full account of current guidance. The Plan cannot pre-empt future guidance. The Scottish Executive has recently issued a Scottish Planning Policy (SPP) note on Green Belts which updates Circular 24/1985. This has been taken into account in finalising both the Structure Plan and St Andrews and East Fife Local Plan.

Action:

Murray, Robert - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

With regards to policy ENV1 it should remain clear that Green belts should be designated under present and future Green Belt planning guidance .

Response:

Green Belt has been delineated taking full account of current guidance. The Plan cannot pre-empt future guidance. The Scottish Executive has recently issued a Scottish Planning Policy (SPP) note on Green Belts which updates Circular 24/1985. This is being taken into account in finalising both the Structure Plan and St Andrews and East Fife Local Plan.

Action:

Oliver, Richard - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

It is considered that the proposed figures for housing development in St Andrews are not based on actual need but on the aspiration of developers. St Andrews cannot provide the jobs for the number of new residents these figures imply and Fife Council has no responsibility to provide housing for people wishing to retire to St Andrews or live there and commute elsewhere.

Response:

Disagree. Housing need figures calculated by Fife Council using Scottish Executive specified methods. It is considered that there is a need for St Andrews to play a vital role in encouraging new employment opportunities. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Fife Council's primary aim should be to provide local housing for those on the Council house waiting list (for St Andrews) - 400 or so. Further more, these houses should be built by Housing Associations rather than commercial developers so that the housing remains affordable and not just affordable at the point of first sale.

Response:

In addition to the Council's waiting list, there are those who are on the waiting list of housing associations and those who do not see Council/housing association accommodation as meeting their needs. The scale of the problem is such that Communities Scotland investment, through Housing Associations is insufficient to meet the shortfall in entirety. In such circumstances the planning system can make a contribution. Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the Council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

No housing should be built on land which should form the natural Green Belt around St Andrews.

Response:

The boundary of the St Andrews Green Belt is delineated for the first time in the draft Local Plan. The Green Belt is designated to provide for necessary development and service other policy objectives.

Action:

Oliver, Susan - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

No housing should be built on land which should form the natural Green Belt around St Andrews.

Response:

The boundary of the St Andrews Green Belt is delineated for the first time in the draft Local Plan. The Green Belt is designated to provide for necessary development and service other policy objectives.

Action:

de Vries, Gordon - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

It is considered that the 1800 houses proposed to be built on the edge of the town would bring a corresponding large increase in traffic. St Andrews already has a huge parking and traffic flow problem which the Structure Plan fails to adequately address. No further expansion of St Andrews should be contemplated before these problems are resolved.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

St Andrews Hotel & Guesthouse Association, Knox, W - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

The 1800 houses proposed to be built on the edge of the town would bring a corresponding large increase in traffic. St Andrews already has a huge parking and travel flow problem which the Structure Plan fails to adequately address. No further expansion of St Andrews should be contemplated before these problems are resolved.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Millar, M A - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

The 1800 houses proposed to be built on the edge of the town would bring a corresponding large increase in traffic. St Andrews already has a huge parking and travel flow problem which the structure plan fails to adequately address. No further expansion of St Andrews should be contemplated before these problems are addressed.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Mathewson, Ken - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

The 1800 houses proposed to be built on the edge of the town would bring a corresponding large increase in traffic. St Andrews already has a huge parking and travel flow problem which the Structure Plan fails to adequately address. No further expansion of St Andrews should be contemplated before these problems are resolved.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Roberts-Jones, Maria & Dell - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

It is considered that the 1800 houses proposed to be built on the edge of the town would bring a corresponding large increase in traffic. St Andrews already has a huge parking and travel flow problem which the Structure Plan fails to adequately address. No further expansion of St Andrews should be contemplated before these problems are resolved.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

The Dunvegan Hotel Ltd, Willougby, Jack - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

It is considered that the 1800 houses proposed to be built on the edge of the town would bring a corresponding large increase in traffic. St Andrews already has a huge parking and travel flow problem which the Structure Plan fails to adequately address. No further expansion of St Andrews should be contemplated before these problems are resolved.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

The Inn On North Street Hotel, Knox, W - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

The 1800 houses proposed to be built on the edge of the town would bring a corresponding large increase in traffic. St Andrews already has a huge parking and travel flow problem which the Structure Plan fails to adequately address. No further expansion of St Andrews should be contemplated before these problems are resolved.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Cordner, M C - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

The 1800 houses proposed to be built on the edge of the town would bring a corresponding large increase in traffic. St Andrews already has a huge parking and travel flow problem which the Structure Plan fails to adequately address. No further expansion of St Andrews should be contemplated before these problems are resolved.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

The Pilmour Hotel, - - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

The 1800 houses proposed to be built on the edge of the town would bring a corresponding large increase in traffic. St Andrews already has a huge parking and travel flow problem which the Structure Plan fails to adequately address. No further expansion of St Andrews should be contemplated before these problems are resolved.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Glenderran Guest House Ltd, Pead, - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

The 1800 houses proposed to be built on the edge of the town would bring a corresponding large increase in traffic. St Andrews already has a huge parking and travel flow problem which the Structure Plan fails to adequately address. No further expansion of St Andrews should be contemplated before these problems are resolved.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Stephens, A. C. - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The objective has proposed the development of St Andrews as a World Class leisure destination and an economic driver for the rest of Fife. The end product is more likely to resemble a grid-locked slum.

Response:

Disagree. Objectives can be secured by proper forward planning of new development. The traffic issues will be addressed via Local Transport Strategy and Area Transport Plan.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

The suggestion that St Andrews needs a thousand and more houses is challenged and Fife Council is requested to consider the resulting traffic chaos in the light of recent estimates of three cars per household. The Strategic Study revealed that St Andrews was at its landscape capacity and that traffic congestion was becoming a problem. The option for large scale development considered at the time of the Study provoked a storm of protest. Since 1998 the problems are more acute and the opinion of residents is less in favour of unbridled development.

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Stephens, W G S - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

The suggestion that St Andrews needs a thousand and more houses is challenged and Fife Council is requested to consider the resulting traffic chaos in the light of recent estimates of three cars per household. The Strategic Study revealed that St Andrews was at its landscape capacity and that traffic congestion was becoming a problem. The option for large scale development considered at the time of the Study provoked a storm of protest. Since 1998 the problems are more acute and the opinion of residents is less in favour of unbridled development.

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Davidson, Duncan - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Considers that it is an elaborate and complex plan for the area including development in a number of settlements including St Andrews, Guardbridge / Leuchars and Tay Bridgehead area. Concerned that the plans do not make provision for education at secondary level. It is suggested therefore that the educational plans, if any, be made explicit and that no additional housing be provided until the infrastructure, including schools, is identified and made available. These arguments also hold for health care services.

Response:

Fife Council is undertaking a review of the delivery of education services for the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

The proposed plans are based on an assumption of an increase in the population referred to as growing the population of Fife. The basis for these estimates is unclear set against a declining population of Scotland as a whole. It is not clear if the figures are based on research and if so what is it? Without clear evidence the Plan is constructed on risky projections and it is essential for residents in Fife for Fife Council to make the basis for the projections explicit if there is to be acceptance and agreement that the proposals are sensible and realistic.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Green Belt proposed in the approved 2002 Fife Structure Plan has been disregarded and the proposals represent a considerable reduction from that plan. It is suggested that boundaries of the 2002 plan should be the Green Belt.

Response:

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries.

Action:

Policy and text amended.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

There is little clarity in the proposals for affordable housing. It is appreciated that this is a national (or indeed international) issue, not unique to Fife. Nevertheless, if plans are to be implemented it is considered that the range of options should be presented, and financing should be explained. In addition it should be made clear whether these houses are for local residents or for others.

Response:

Affordable housing is a complex and dynamic issue. It is a national issue which faces many local authorities. However it is considered that the Finalised Structure Plan, Supplementary Guidance on Affordable Housing and the Local Plans will provide a consistent framework to address the issue. The Structure Plan is a strategic land use planning document and must confine itself to such a remit. However, Fife Council is also pursuing a range of other non-land use initiatives to facilitate affordable housing. These include reductions in Council Tax discount for second homes, suspension of the right-to-buy in pressured areas and use of surplus Council owned land. Reference to this range of additional measures that the Council is pursuing has been inserted into the supporting text. The issue of a priority client group is addressed separately in the Implementation Guide on Affordable Housing.

Action:

Insert text to outline additional measures being taken.

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Whilst the strategy document proposes to raise the profile of St Andrews there appears to be little in the Plan to explain how this aspirational statement will be implemented. St Andrews' international profile is because of golf, the medieval city and the University, none of which are the responsibility of Fife Council. The responsibility of Fife Council is to provide the infrastructure to facilitate the World Class Destination.

Response:

The details of the implementation of the Structure Plan Strategy are set out in the Area Local Plan and will be addressed in subsequent Master Plans and development briefs.

Action:

Davidson, Anne - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

The Scottish Executive promised St Andrews a Green Belt and there have been two suggestions as to the boundaries which should seek to protect the landscape setting of the town. St Andrews is a very special place, but will not remain so if over-developed and with the loss of its precious landscape setting. Whilst it is difficult to work out exact boundaries it is clear that they have been reduced and there is a danger that by the time Green Belt boundaries are selected it will already be developed.

Response:

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which also identify the boundaries.

Action:

Policy and text amended.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

It is considered that the proposed plans, based on the assumption the population for Fife will increase is wishful thinking. This implies that Fife is different from the rest of Scotland which has a falling population and it is not clear why St Andrews is expected to grow at a greater rate unless it is because of pressures from the construction industry which can make greater profits in St Andrews.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

It remains that an elaborate and complex plan has been produced for the area proposing development in a number of settlements including St Andrews, Guardbridge/Leuchars and Tay Bridgehead area despite not making provision for education at secondary level. It is suggested that the educational plans, if any, be made explicit and that no additional housing be provided until the infrastructure, including schools, is identified and made available. These arguments also hold for health care services.

Response:

Fife Council is undertaking a review of the delivery of education services for the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

A new health centre and hospital is being sited encroaching on the Green Belt, in an area that would cause concern if proposed for any other use. It is unlikely to be a beautiful building, and it would be sad if it rapidly became inadequate to serve the growing population.

Response:

The need for a new hospital was addressed in the Fife Structure Plan (Approved 2002). The site is not a strategic planning issue. The Structure Plan states that a site would be identified and progressed by the appropriate Local Plan. The site proposed in the Local Plan is the one preferred by NHS Fife.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is considered that St Andrews is visited either because it is a beautiful old medieval town or has a golf centre. The University expansion has already put pressure on the town. More expansion will make it less desirable rather than more so.

Response:

It is considered that the planned growth of St Andrews will ensure that new development will not reduce its desirability as a visitor destination. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Affordable housing is an issue which is in need of serious consideration before the Structure Plan is confirmed.

Response:

Noted. Affordable housing is one of the key challenges facing the Structure Plan and Fife Council. There was widespread public consultation on both the Consultative Draft Structure Plan and Supplementary Guidance. In addition, an updated housing needs and affordability study was undertaken. All of these elements have been taken into account in finalising the Structure Plan and the Supplementary Guidance.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Houses in Multiple Occupancy

Comment:

The issue of housing in multiple occupancy requires to be given serious consideration before the Structure Plan is confirmed.

Response:

Noted. It is acknowledged that this is an important local issue. However as the Structure Plan is a strategic document, this matter is more appropriately addressed by the Local Plan process, especially the St Andrews and East Fife Local Plan.

Action:

Murphy, Lyn - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Fife Council should be praised for placing an emphasis on affordable housing as such housing is desperately required in St Andrews and identifying, in the Supplementary Guidance on Affordable Housing, that social rented housing is a clear priority

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Strategy for growth for Fife is honourable. However the geographical location of St Andrews is such that it does not lend itself to expansion. There is nothing in the plan to suggest that there will be any substantial increased employment within St Andrews over the period of the Plan. Housing needed for those working and living in the town is not significant. An influx of retired people and holiday home owners will not contribute to a mixed and balanced community. The strategy for growth should direct development to other areas.

Response:

Support for strategy for growth noted. It is considered that the planned growth of St Andrews will ensure that its major features will not reduce its desirability as a visitor destination. Fife Council is seeking to provide affordable housing to ensure that a mixed and balanced community can be achieved. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

The schools in the St Andrews area are already at full capacity. Object to the lack of reference in the Plans to the expansion of secondary schooling such as the long awaited Tay Bridgehead School at Tayport.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

The location for the proposed new hospital should be seriously reconsidered as it is suggested that the site at St Leonards Fields could be utilised in preference to the Largo road site.

Response:

The need for a new hospital was addressed in the Fife Structure Plan (Approved 2002). The site is not a strategic planning issue. The Structure Plan states that a site would be identified and progressed by the appropriate Local Plan. The site proposed in the Local Plan is the one preferred by NHS Fife.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

It is suggested that the park and ride at West Sands should be removed from the Plan as this would exacerbate serious congestion around Granny Clark's Wynd and Golf Place. It is suggested that a multi-storey car park is constructed at Petheram Bridge or St Mary's Place to reduce traffic congestion. In addition the introduction of any sort of ring-road would be a complete waste of time as it has been recorded that only approximately 10% of traffic entering St Andrews is through traffic and the rest of the traffic is bound for St Andrews itself.

Response:

These are detailed issues to be addressed via the Local Transport Strategy and Area Transport Plan.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

It is considered that the Plan has failed to deliver the Green Belt mandated by the Scottish Executive and in the 2002 Structure Plan. Development on the scale proposed would irretrievably damage the landscape setting and heritage of St Andrews. In particular Fife Council has completely ignored the Landscape Assessments Study produced by expert consultants in March 2003.

Response:

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries.

Action:

Policy and text amended.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Fife Council should be praised for requiring developers to build 45% affordable housing when the Scottish Executive suggests only 15%. It is feared however that developer pressure will force the Council to reduce the percentage to 15% or less.

Response:

The percentage requirement for the St Andrews housing market area has been revised to 30% in the light of PAN 74, which sets a benchmark of 25%; the public consultation; and the updated Housing Needs and Affordability Study.

Action:

Change percentage requirements in Finalised Plan Policy H4 (Draft Plan Policy H5).

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

While securing affordable housing as part of a developer led development will produce some affordable housing it is not the solution.

Response:

The provision of affordable housing through the planning system is a legitimate means of contributing to meeting the needs for affordable housing. This is supported by the Scottish Executive's planning policy. Many local authorities in Britain are using this approach. It is acknowledged however, that the planning system can only make a contribution to meeting the shortfall; it cannot address it in entirety.

Action:

No Change

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The Council needs to consider other ways to provide affordable housing (Pressured Area Status; restrictions on house purchase to favour local people; only allowing housing associations to carry out housing developments where tenants do not have the right to buy; introduce Homestake; Compulsory Purchase Orders; allocation of some of the £1.3 billion to St Andrews).

Response:

Through the Local Housing Strategy the Council, and its partners, sets out a wide approach to delivering affordable housing, including pressured area status. The Structure Plan sets out the policy approach for delivering affordable housing through the planning system. Reference to a range of additional measures that the Council is pursuing has been inserted into the supporting text.

Action:

Insert text to outline additional measures being taken.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Affordable housing should be available in perpetuity

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

No Change

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Greenfield building to be limited to affordable housing only to create a mixed and balanced community.

Response:

Noted. However, there is also a need for other forms of housing on greenfield land. The Council's priority is to re-use brownfield sites.

Action:

Murphy, Ronald - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Fife Council should be praised for placing an emphasis on affordable housing as such housing is desperately required in St Andrews and identifying, in the Supplementary Guidance on Affordable Housing, that social rented housing is a clear priority

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Strategy for growth for Fife is honourable. However the geographical location of St Andrews is such that it does not lend itself to expansion. There is nothing in the plan to suggest that there will be any substantial increased employment within St Andrews over the period of the Plan. Housing needed for those working and living in the town is not significant. An influx of retired people and holiday home owners will not contribute to a mixed and balanced community. The strategy for growth should direct development to other areas.

Response:

It is considered that the planned growth of St Andrews will ensure that its major features will not reduce its desirability as a visitor destination. Fife Council is seeking to provide affordable housing to ensure that a mixed and balanced community can be achieved. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

The schools in the St Andrews area are already at full capacity. Object to the lack of reference in the Plans to the expansion of secondary schooling such as the long awaited Tay Bridgehead School at Tayport.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

The location for the proposed new hospital should be seriously reconsidered as it is suggested that the site at St Leonards Fields could be utilised in preference to the Largo Road site.

Response:

The need for a new hospital was addressed in the Fife Structure Plan (Approved 2002). The site is not a strategic planning issue. The Structure Plan states that a site would be identified and progressed by the appropriate Local Plan. The site proposed in the Local Plan is the one preferred by NHS Fife.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

It is suggested that the park and ride at West Sands should be removed from the Plan as this would exacerbate serious congestion around Granny Clark's Wynd and Golf Place. It is suggested that a multi-storey car park is constructed at Petheram Bridge or St Mary's Place to reduce traffic congestion. In addition the introduction of any sort of ring-road would be a complete waste of time as it has been recorded that only approximately 10% of traffic entering St Andrews is through traffic and the rest of the traffic is bound for St Andrews itself.

Response:

These are detailed issues to be addressed via the Local Transport Strategy and Area Transport Plan.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

It is considered that the Plan has failed to deliver the Green Belt mandated by the Scottish Executive and in the 2002 Structure Plan. Development on the scale proposed would irretrievably damage the landscape setting and heritage of St Andrews. In particular Fife Council has completely ignored the Landscape Assessments Study produced by expert consultants in March 2003.

Response:

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries.

Action:

Policy and text amended.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Fife Council should be praised for requiring developers to build 45% affordable housing when the Scottish Executive suggests only 15%. It is feared however that developer pressure will force the Council to reduce the percentage to 15% or less.

Response:

The percentage requirement for the St Andrews housing market area has been revised to 30% in the light of Pan 74, which sets a benchmark of 25%; the public consultation; and the updated Housing Needs and Affordability Study.

Action:

Change percentage requirements in Finalised Plan Policy H4 (Draft Plan H5).

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

While securing affordable housing as part of a developer led development will produce some affordable housing it is not the solution.

Response:

The provision of affordable housing through the planning system is a legitimate means of contributing to meeting the needs for affordable housing. This is supported by the Scottish Executive's planning policy. Many local authorities in Britain are using this approach. It is acknowledged however, that the planning system can only make a contribution to meeting the shortfall; it cannot address it in entirety.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The Council needs to consider other ways to provide affordable housing (Pressured Area Status; restrictions on house purchase to favour local people; only allowing housing associations to carry out housing developments where tenants do not have the right to buy; introduce Homestake; Compulsory Purchase Orders; allocation of some of the £1.3 billion to St Andrews).

Response:

Through the Local Housing Strategy the Council, and its partners, sets out a wide approach to delivering affordable housing, including Pressured Area Status, reduction on Council Tax discount on second homes and use of Council owned land. The Structure Plan sets out the policy approach for delivering affordable housing through the planning system. Reference to a range of additional measures that the Council is pursuing has been inserted into the supporting text.

Action:

Insert text to outline additional measures being taken.

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Affordable housing should be available in perpetuity.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

No Change

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Greenfield building to be limited to affordable housing only to create a mixed and balanced community.

Response:

Noted. However, there is also a need for other forms of housing on greenfield land. The Council's priority is to re-use brownfield sites.

Action:

Chapman, Valerie - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

It is considered that more housing in St Andrews should would make an already intolerable situation with regards to traffic gridlock considerably worse.

Response:

The specific allocation of land for future development is a function for the Local Plan process. Full account has been taken of the important requirements and this will be addressed in detail via Local Plan, masterplans and development briefs. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Infrastructure

Comment:

It is considered that the proposed additional housing in St Andrews would not only compound the existing traffic problems but would also place possible strains on the essential infrastructure of the town. It is considered that an additional secondary school would be required and this would bring with it additional transport related problems.

Resnonses

It is the intention to ensure that the appropriate level of infrastructure and other services required will be provided at the appropriate time. Strategic development within the town will encompass a new distributor road. The issue of public transport network will be addressed via the Local Transport Strategy and Area Transport Plan. Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Houses in Multiple Occupancy

Comment:

It is considered that no thought has been given, in recent times, to the balance between local residents and the floating student population. More and more property in the town is being bought up for students. This has the additional spin-off that greater Council Tax burden falls on the local residents. Instead of allowing an explosion of new housing, much thought needs to be given to the type of housing required to achieve a sensible balance in the various parts of the town between full time residents and students.

Response:

Noted. It is acknowledged that this is an important local issue. However as the Structure Plan is a strategic document, this matter is more appropriately addressed by the Local Plan process, especially the St Andrews and East Fife Local Plan. The issue of Council Tax is not a land use planning matter. Fife Council has no powers to require the University of St Andrews to provide student accommodation, nor can the University require any student to use any such accommodation provided. However, the Council is liaising with the University.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Built Environment

Comment:

Proposals for development on West Burn Lane show how little feeling or understanding potential developers have for St Andrews as their proposed buildings are inappropriate for the centre of the historic burgh.

Response:

This issue would be fully considered prior to the determination of any site specific planning application. The Urban Design Guide provides advice on the Council's expectations of quality design within the context of the National Planning Framework.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

The consultation meeting at Madras College, St Andrews has doubtless shown the depth of local feeling. How much more meaningful would consultation be if the opinion of local residents was canvassed before the draft Structure Plan was drawn up? We can only hope that at this late stage Fife planners will consult in a really meaningful way and try to enlist the support of local residents rather than the current blazing hostility.

Response:

Concerns noted. Fife Council will review its approach to the consultation process to improve consultations in the future. Comments have been considered in finalising the Structure Plan.

Action:

Review consultation process.

Chapman, Roy De C C - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Infrastructure

Comment:

Consider that more housing in St Andrews would make an already intolerable situation with regards to traffic gridlock considerably worse.

Response:

It is the intention to ensure that the appropriate level of infrastructure and other services required will be provided at the appropriate time. Strategic development within the town will encompass a new distributor road. The issue of public transport network will be addressed via the Local Transport Strategy and Area Transport Plan. Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Infrastructure

Comment:

Consider that the proposed additional housing would not only compound the existing traffic problems but would also place strains on the essential infrastructure of the town. It is considered that an additional secondary school would be required and this would bring with it additional transport related problems.

Response:

As stated above, (0261 01), infrastructure provision is considered, together with the likely implication of new development.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Houses in Multiple Occupancy

Comment:

Consider that no thought has been given, in recent times, to the balance between local residents and the floating student population. More and more property in the town is being bought up for students. This has the additional spin-off that greater council tax burden falls on the local residents. Instead of allowing an explosion of new housing, much thought needs to be given to the type of housing required to achieve a sensible balance in the various parts of the town between full time residents and students.

Response:

Noted. It is acknowledged that this is an important local issue. However as the Structure Plan is a strategic document, this matter is more appropriately addressed by the Local Plan process, especially the St Andrews and East Fife Local Plan. The legislation on Council Tax is set by the Scottish Executive.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Built Environment

Comment:

Proposals for development on West Burn Lane show how little feeling or understanding potential developers have in St Andrews as their proposed buildings appropriate to the centre of the historic burgh.

Response:

This issue would be fully considered prior to the determination of any site specific planning application. The Urban Design Guide provides advice on the Council's expectations of quality design within the context of the National Planning Framework.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

The consultation meeting at Madras College, St Andrews has doubtless shown the depth of local feeling. How much more meaningful would consultation be if the opinion of local residents was canvassed before the draft Structure Plan was drawn up? We can only hope that at this late stage Fife planners will consult in a really meaningful way and try to enlist the support of local residents rather than the current blazing hostility.

Response:

Concerns noted. Fife Council will review its approach to the consultation process to improve consultations in the future. Comments have been considered in finalising the Structure Plan.

Action:

Review consultation process.

Picton, J. D. - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

It is considered that if 2000 houses were added to St Andrews its landscape and setting would be destroyed. It is considered that we will not see any real appreciation of St Andrews from Fife Council or indeed the Scottish Executive. The wish for money and the promotion of developers will always win through over any thoughts of protecting St Andrews.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

It is not clear for how long the proposed affordable housing will be affordable and it is not clear how such houses will be allocated to those with local ties to St Andrews.

Response:

Retention of affordable housing is an important issue and this is addressed in Finalised Plan Policy H4 (Draft Plan Policy H5). Precise arrangements will vary between tenures. The matter of allocation is not a strategic land use planning issue but is addressed in detail in the Implementation Guide on affordable housing produced by Fife Council Housing Service.

Action:

Picton, E. M. - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

It is considered that if 2000 houses were added to St Andrews its landscape and setting would be destroyed. It is considered that we will not see any real appreciation of St Andrews from Fife Council or indeed the Scottish Executive. The wish for money and the promotion of developers will always win through over any thoughts of protecting St Andrews.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

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Response:

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Action:

Strachan, Eleanor - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Object to the draft Structure Plan proposals for St Andrews because the additional housing will result in traffic gridlock in the town centre becoming more frequent. The proposed Green Belt will be destroyed and Madras College will become more overcrowded and the infrastructure of the town will not be able to support such numbers.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Strachan, Archibald - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Object to the draft Structure Plan proposals for St Andrews because the additional housing will result in traffic gridlock in the town centre becoming more frequent. The proposed Green Belt will be destroyed, Madras College will become further overcrowded, and the infrastructure of the town will not be able to support such numbers.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Joy, Frances - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Object to the proposals for St Andrews as it does not need this number of new houses. The expansion of the University must be carefully controlled otherwise the character of St Andrews will be lost forever. Although some expansion is expected, this should be kept to a minimum. The town infrastructure can barely cope with the numbers at present and the traffic management system of the town cannot cope during busy periods when the town becomes gridlocked.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

If the University was made to accommodate 90% of the student population, this would free up a lot of affordable housing stock which is at present used for student lets. This would also increase the rateable income as at present no income is received by student occupied property.

Response:

This is not a strategic land and planning issue and as such is more properly addressed by the St Andrews and East Fife Local Plan. Comment will be considered in that context.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Traffic management system requires to be re-thought and there is inadequate parking in the town centre, causing problems for locals and visitors alike. It is suggested that a multi-storey car park be built on the site of the present Fife Council offices at St Mary's Street to achieve this.

Response:

These are detailed issues to be addressed via the Local Transport Strategy and Area Transport Plan.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Business rates in St Andrews have reached such a high level that very few independent businesses can exist. This is made very evident by the numbers of charity shops, estate agents offices, and national trading coffee shops etc. None of these are true retail outlets and are to the detriment of the town centre. St Andrews has lost most of its shopping appeal to the visitor.

Response:

Business rates are not a strategic land use planning issue, These are set by the Scottish Parliament. Town centres are dynamic locations and the planning system cannot preserve a location at any point in time. The Finalised Structure Plan recognises the importance of retailing in maintaining and enhancing the town's appeal to visitors and residents.

Action:

Joy, Michael - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Object to the proposals for St Andrews and it does not need this number of new houses. The expansion of the University must be carefully controlled otherwise the character of St Andrews will be lost forever. Although some expansion is expected, this should be kept to a minimum. The town infrastructure can barely cope with the numbers at present and the traffic management system of the town cannot cope during busy periods when the town becomes gridlocked.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

If the University was made to accommodate 90% of the student population, this would free up a lot of affordable housing stock which is at present used for student lets. This would also increase the rateable income as at present no income is received by student occupied property.

Response:

Noted. However, the Council cannot require a University to provide residences. This issue is more properly addressed by the St Andrews and East Fife Local Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Traffic management system requires to be re-thought and there is inadequate parking in the town centre causing problems for locals and visitors alike. It is suggested that a multi-storey car park be built on the site of the present Fife Council offices at St Mary's Street to achieve this.

Response:

These are detailed issues to be addressed via the Local Transport Strategy and Area Transport Plan.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Business rates in St Andrews have reached such a high level that very few independent businesses can exist. This is made very evident by the numbers of charity shops, estate agents offices, and national trading coffee shops etc. None of these are true retail outlets and are to the detriment of the town centre. St Andrews has lost most of its shopping appeal to the visitor.

Response:

Business rates are not a strategic land use planning issue, These are set by the Scottish Parliament. Town centres are dynamic locations and the planning system cannot preserve a location at any point in time. The Finalised Structure Plan recognises the importance of retailing in maintaining and enhancing the town's appeal to visitors and residents.

Action:

Robertson, Patricia - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Do not object to building of protected low cost housing to meet the needs of local people.

Response:

Comment noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Fife Council appears oblivious to the fact that there is a serious lack of employment in North East Fife. Local people are already forced to travel for employment. In addition much of the employment that is available locally fails to provide a decent living wage.

Response:

The strategy seeks to encourage opportunities into the area by a range of measures including providing the appropriate amount of employment land.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

As one of the main land owners in the area St Andrews University is failing to act with responsibility. It is compounding the housing crisis by increasing the housing prices and bringing more employees into the area without providing accommodation them. There is concern that plans assume that the University will benefit from development as a result of sale for land to developers and the provision of infrastructure for further university building developments. However, the University is still doing nothing to solve the housing crisis which they have been partly responsible for in this area.

Response:

Noted. However, the Council cannot require a University to provide residences. This issue is more properly addressed by the St Andrews and East Fife Local Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Infrastructure

Comment:

There is no evidence in the Plan of infrastructure provision for the future. Logically, infrastructure should come first, then plans for housing.

Response:

It is the intention to ensure that the appropriate level of infrastructure and other services required will be provided at the appropriate time.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

There is concern about the condition of the roads and the lack of proposals in the Plan for urgently needed and long promised bypasses for Cupar and St Andrews. There is concern that the existing road network would not be able to cope with the traffic generated by the additional development.

Response:

These are detailed issues to be addressed via the Local Transport Strategy and Area Transport Plan.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Public Transport

Comment:

The current high cost of public transport encourages people to use cars and no mention has been made of any plans to reduce these costs. Public transport must be accessible and affordable to all.

Response:

Concerns about cost of public transport noted but not a strategic planning issue and is a matter for the Local Transport Strategy. Fife Council has also pressed for rail improvements.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Secondary schools in this area are already overcrowded and have been for many years. Plans to deal with this problem must be addressed once and for all. In addition lack of capacity in primary schools in a number of areas in north east Fife should also be addressed.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

It is considered that the health care centre in St Andrews is already overcrowded and there is a requirement for increased facilities. It is considered that the problem of overcrowding is compounded by the ever-increasing number of students who are no longer cared for by University medical staff and who now attend the health centre, thereby exacerbating existing problems. In addition, the health care provision is also made worse by the high proportion of elderly people retiring to St Andrews. It is considered that these problems will be greatly magnified by any additional housing and it must be ensured that the provision of additional facilities is made in advance of any new development.

Response:

The provision of new plan/additional health care facilities is a matter for NHS Fife who are aware of the proposals for growing Fife's population 2006-2026.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Although Fife Council has stated that 45% of the total of proposed housing should be affordable there is no definition of what is considered affordable and by whom.

Response:

The percentage requirement for the St Andrews housing market areas has been revised in the light of PAN74, the public consultation and the results of the updated Housing Needs and Affordability Study. Affordable housing is defined in the Glossary of the Finalised Structure Plan and this is the same as that used by the Scottish Executive. It is defined as "Housing of a reasonable quality that is affordable to people on modest incomes. In some cases the market can provide all or some of the affordable housing that is needed, but in other places it is necessary to make housing available at a cost below market value to meet an identified need." In terms of low cost housing for sale, which is but one means of delivering affordable housing, affordability will be determined by house prices and average household incomes which vary across Fife. The updated Housing Needs and Affordability Study will be used to determine target house prices. These are set out in the Implementation Guide on Affordable Housing.

Action:

Change percentage requirements in Finalised Plan Policy H4 (Draft Plan H5).

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

We are told that the Scottish Executive states 25% of housing should be affordable. So what is the definite amount or is that still to be eroded by the developer as usual.

Response.

The percentage requirement for the St Andrews housing market area has been revised and set at 30% in the light of PAN 74 (which sets a benchmark of 25%), the public consultation; and the updated Housing Needs and Affordability Study.

Action:

Change percentage requirements in Finalised Plan Policy H4 (Draft Plan H5).

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

There is no mention of special status for St Andrews and surrounding areas.

Response:

Fife Council is seeking Pressured Area Status for the St Andrews area. This is reflected in a slightly higher percentage requirement for the St Andrews housing market area than the Scottish Executive's 25% benchmark. Reference to this is made in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing. Reference to a range of additional measures that the Council is pursuing has been inserted into the supporting text. In a wider context, the Plan recognises St Andrews heritage as being of international importance.

Action:

Insert text to outline additional measures being taken.

Comment No: 12

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

There is no mention of developers setting aside a sum of money (per house) to add to Communities Scotland Gro Grant to subsidise low cost housing.

Response:

This level of detail is inappropriate for the Structure Plan which is a strategic planning document. Where appropriate, developers will be required to contribute to meeting the needs for affordable housing - this is addressed by Finalised Plan Policy H4 (Draft Plan Policy H5.).

Action:

No Change

Comment No: 13

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

There is no guarantee that the genuinely local people will get priority for affordable housing.

Response:

This is not a land use planning issue. However, Fife Council's Housing Service has published an Implementation Guide on Affordable Housing, which sets out priority client groups. Households with local connections are given priority but not exclusively so. Some provision is made for incoming workers for example.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

With low cost housing for sale, allocations must be made fairly and long term occupancy conditions placed on them to keep them low cost.

Response:

Comments noted. The issue of allocations to particular client groups is not a land use planning matter but is addressed in the Implementation Guide on Affordable Housing published by the Council's Housing Service. It is agreed that the issue of long term retention is important and this is addressed by Finalised Plan Policy H4 (Draft Plan H5).

Action:

No Change

Comment No: 15

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

What happened to the £12 million allocated to the council for low cost housing in this area?

Response:

This is not a land use planning issue. However, the funding disbursed by Communities Scotland (CS) is paid to housing associations and in some cases to private developers and not to Fife Council, although the Council does have an influence on where it is allocated. This is done on the basis of identified need. Whilst the St Andrews Housing Market Area (HMA) has, in relative terms the highest level of need in Fife there are other areas with significant need also. The Dunfermline HMA, for example, has the highest level of absolute need in Fife. Both Fife Council and CS are well aware of the identified shortage of affordable housing in the St Andrews area. Consequently, several developments have been financed in the area in the last few years. Recent projects in the area amount to £5 million investment from CS. Fife Council and CS are constantly reviewing the land available in the St Andrews area and funding has been provided to Kingdom Housing Association to identify future opportunities for affordable housing.

Action:

Robertson, Sarah-Ellen - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Do not object to building of protected low cost housing to meet the needs of local people.

Response:

Comment noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Fife Council appears oblivious to the fact that there is a serious lack of employment in North East Fife. Local people are already forced to travel for employment. In addition much of the employment that is available locally fails to provide a decent living wage.

Response:

The strategy seeks to encourage opportunities into the area by a range of measures ncluding providing the appropriate amount of employment land.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

As one of the main land owners in the area St Andrews University is failing to act with responsibility. It is compounding the housing crisis by increasing the housing prices and bringing more employees into the area without providing accommodation them. There is concern that plans assume that the University will benefit from development as a result of sale for land to developers and the provision of infrastructure for further university building developments. However, the university is still doing nothing to solve the housing crisis which it has been partly responsible for in this area.

Response:

Noted. However, the Council cannot require a University to provide residences. This issue is more properly addressed by the St Andrews and East Fife Local Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Infrastructure

Comment:

There is no evidence in the Plan of infrastructure provision for the future. Logically infrastructure should come first then plans for housing.

Response:

It is the intention to ensure that the appropriate level of infrastructure and other services required will be provided at the appropriate time.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

There is concern about the condition of the roads and the lack of proposals in the Plan for urgently needed and long promised bypasses for Cupar and St Andrews. There is concern that the existing road network would not be able to cope with the traffic generated by the additional development.

Response:

These are detailed issues to be addressed via the Local Transport Strategy and Area Transport Plan.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Public Transport

Comment:

The current high cost of public transport encourages people to use cars and no mention has been made of any plans to reduce these costs. Public transport must be accessible and affordable to all.

Response:

Concerns about cost of public transport noted but not a strategic planning issue and is a matter for the Local Transport Strategy. Fife Council has also pressed for rail improvements.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Secondary schools in this area are already overcrowded and have been for many years. Plans to deal with this problem must be addressed once and for all. In addition lack of capacity in primary schools in North East Fife should also be addressed.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the schools Estate Strategy service. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the location of new school faculties will be the subject of public debate.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Although Fife Council has stated that 45% of the total of proposed housing should be affordable there is no definition of what is considered affordable and to whom.

Response:

The percentage requirement for the St Andrews housing market area has been reviewed in the light of PAN74, the public consultation and the results of the updated Housing Needs and Affordability Study. Affordable housing is defined in the Glossary of the Finalised Structure Plan and this is the same as that used by the Scottish Executive. It is defined as "Housing of a reasonable quality that is affordable to people on modest incomes. In some cases the market can provide all or some of the affordable housing that is needed, but in other places it is necessary to make housing available at a cost below market value to meet an identified need." In terms of low cost housing for sale, which is but one means of delivering affordable housing, affordability will be determined by house prices and average household incomes which vary across Fife. The updated Housing Needs and Affordability Study will be used to determine target house prices. These are set out in the Implementation Guide on Affordable Housing.

Action:

Change percentage requirements in Finalised Plan Policy H4 (Draft Plan H5).

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

We are told that the Scottish Executive state 25% should be affordable. So what is the definite amount or is that still to be eroded by the developer as usual.

Response:

The percentage requirement for the St Andrews Housing Market Area has been revised and set at 30% in the light of PAN 74 (which sets a benchmark of 25%), the public consultation; and the updated Housing Needs and Affordability Study.

Action:

Change percentage requirement.

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

There is no mention of special status for St Andrews and surrounding areas.

Response:

Fife Council is seeking Pressured Area Status for the St Andrews area. This is reflected in a slightly higher percentage requirement for the St Andrews Housing Market Area than the Scottish Executive's 25% benchmark. Reference to this is made in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing. Reference to a range of additional measures that the Council is pursuing has been inserted into the supporting text. In a wider context, the Plan recognises St Andrews heritage as being of international importance.

Action:

Insert text to outline additional measures being taken.

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

There is no mention of developers setting aside a sum of money (per house) to add to Communities Scotland Gro grant to subsidise low cost housing.

Response:

This level of detail is inappropriate for the Structure Plan which is a strategic planning document. Where appropriate, developers will be required to contribute to meeting the needs for affordable housing - this is addressed by Finalised Plan Policy H4 (Draft Plan Policy H5).

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

There is no guarantee that the genuinely local people will get priority for affordable housing.

Response:

This is not a land use planning issue. However, Fife Council's Housing Service has published an Implementation Guide on Affordable Housing, which sets out priority client groups. Households with local connections are given priority but not exclusively so. Some provision is made for incoming workers for example.

Action:

No Change

Comment No: 13

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

With low cost housing for sale, allocations must be made fairly and long term occupancy conditions placed on them to keep them low cost.

Response:

The issue of client allocations is not a land use planning issue. However, Fife Council's Housing Service has published an Implementation Guide on Affordable Housing, which sets out priority client groups. Households with local connections are given priority but not exclusively so. Some provision is made for incoming workers for example. It is agreed that the issue of long term retention is important and this is addressed by Finalised Plan Policy H4 (Draft Plan Policy H5).

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

What happened to the £12 million allocated to the council for low cost housing in this area?

Response:

This is not a land use planning issue however, the funding disbursed by Communities Scotland (CS) is paid to housing associations and in some cases to private developers and not to Fife Council, although the Council does have an influence on where it is allocated. This is done on the basis of identified need. Whilst the St Andrews Housing Market Area (HMA) has, in relative terms the highest level of need in Fife there are other areas with significant need also. The Dunfermline HMA, for example, has the highest level of absolute need in Fife. Both Fife Council and CS are well aware of the identified shortage of affordable housing in the St Andrews area. Consequently several developments have been financed in the area in the last few years. Recent projects in the area amount to £5 million investment from CS. Fife Council and CS are constantly reviewing the land available in the St Andrews area and funding has been provided to Kingdom Housing Association to identify future opportunities for affordable housing.

Action:

Weir, Mike - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The Plan overall is only aspirational and is a developer's wish list rather than giving proper and focussed consideration on how to best serve the genuine needs of St Andrews. St Andrews would be degraded by the Plan and become less, rather than more, of an attraction.

Response:

Disagree. Housing land provision is identified to meet Fife needs and attractiveness of St Andrews can be retained and enhanced via properly planned development.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The Plan increases the population and inevitably increases the traffic to St Andrews. The town cannot take any extra traffic and any one visiting the town centre on any day can see this.

Response:

The traffic and other issues will be fully addressed via land use planning and transport processes which include the Local Transport Strategy and Area Transport Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Views approaching St Andrews require to be preserved. It is noted that the St Andrews Strategic Study in 1998, which looked at the following 15 to 20 years, concluded that St Andrews was at its landscape capacity and that no major expansion should take place. The landscape of St Andrews is crucial to its character. The proposals in the Structure Plan substantially degrade those views and a Green Belt preserving them needs to be established urgently to stop developers trying to repeatedly encroach into the area.

Response:

The proposed scale of development is considered appropriate to meet the projected requirements for the period to 2026. The numbers have been reviewed and St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need, taking account of the proposed Green Belt boundaries. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

St Andrews requires more affordable housing, but 45% is likely to be an overestimate of the actual requirements.

Response:

The percentage requirement for the St Andrews housing market area has been revised in the Finalised Structure Plan. This was done in response to the publication of PAN 74 and also to the results of the updated Housing Needs and Affordability Study which identified a need for just under 1,500 new affordable houses in the St Andrews housing market area. Draft Plan Policy H5 now Finalised Plan Policy H4.

Action:

Change percentage requirements in Finalised Plan Policy H4 (Draft Plan Policy H5) (and Policy AH1 of the Supplementary Guidance).

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

There needs to be a new secondary school in North Fife to relieve the pressure on St Andrews schools and the town centre.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

The rail link with St Andrews should be restored by 2026 to relieve the traffic pressure on the town and reduce the pollution. Need to introduce "greener" transport.

Response:

Proposal PT1 of the Finalised Structure Plan (PT2 of the Draft Plan) refers to options to connect St Andrews to the rail network. The Plan seeks to promote travel choice by identifying and supporting a range of transport improvements.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Fife Council should not keep introducing new Structure Plans in advance of the renewal times laid out in previous plans. In addition Fife Council should appoint a much more appropriate number and type of people who actually live in St Andrews and who do not have commercial or career interests in development, to the committees involved in drawing up their plans.

Response:

The Approved Fife Structure Plan 2002 (Proposal PM1) makes it clear that the Plan would be reviewed prior to 2006. In view of the lead in times it is impossible to wait for the end date of one plan to start replacement work. Fife Council Committees are comprised of elected members who are subject to a Code of Conduct with respect to any interests they may have. Fife Council has no control over members' place of residence..

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

How many pages does Fife Council expect the citizen to seriously study and refer to? There are 490 pages in the documents listed in this consultation exercise.

Response:

Concerns about the extent of the package of consultation documents are noted. As the documents were inter-related it was considered necessary to issue them at the same time. The consultation process is under review to improve consultations in the future.

Action:

Review consultation process.

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Concerned that affordable housing is only affordable to the first purchaser as there are no controls to ensure that the property remains affordable in perpetuity.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the Council will use legal mechanisms and/or Section 75 agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Scheme just for affordable houses with the right number for a mix of rent and buy is required.

Response:

In line with Scottish Executive and Fife Council policy, the Structure Plan seeks to achieve mixed and balanced communities with a range of house types and tenures. Affordable housing should be well integrated with mainstream housing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

There should be no new expensive houses built.

Response:

The Structure Plan identifies the amount and location of new housing land, with support for the allocation in local plans for a range of sites and tenures. It is for the development industry to prescribe the individual type and price of new development in response to market demand.

Action:

Weir, Valerie - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The Plan overall is only aspirational and is a developer's wish list rather than giving proper and focussed consideration on how to best serve the genuine needs of St Andrews. St Andrews would be degraded by the plan and become less, rather than more, of an attraction.

Response:

Disagree. Housing land provision is identified to meet Fife needs and attractiveness can be retained and enhanced via properly planned development. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The Plan increases the population and inevitably increases the traffic to St Andrews. The town cannot take any extra traffic and any one visiting the town centre on any day can see this.

Response:

The traffic and other issues will be fully addressed via land use planning and transport processes which includes the Local Transport strategy and Area Transport Plan.

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section of demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Views approaching St Andrews require to be preserved. It is noted that amongst the conclusions of the St Andrews Strategic Study in 1998, which looked at the following 15 to 20 years concluded that St Andrews was at its landscape capacity and that no major expansion should take place. The landscape of St Andrews is crucial to its character. The proposals in the Structure Plan substantially degrades those views and a Green Belt preserving them needs to be established urgently to stop developers trying to repeatedly encroach into the area.

Response:

The proposed scale of development is considered appropriate to meet the projected requirements for the period to 2026. The numbers have been reviewed and St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need, taking account of the proposed Green Belt boundaries. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

St Andrews requires more affordable housing, but 45% is likely to be an overestimate of the actual requirements.

Response:

The percentage requirement for the St Andrews housing market area has been revised in the Finalised Structure Plan. This was done in response to the publication of PAN 74 and also to the results of the updated Housing Needs and Affordability Study which identified a need for just under 1,500 new affordable houses in the St Andrews housing market area.

Action:

Change percentage requirement in Finalised Plan Policy H4 (was H5).

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

There needs to be a new secondary school in North Fife to relieve the pressure on St Andrews schools and the town centre.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

The rail link with St Andrews should be restored by 2026 to relieve the traffic pressure on the town and reduce the pollution. Need to introduce "greener" transport.

Response:

Proposal PT1 of the Finalised Structure Plan (PT2 of the Draft Plan) refers to options to connect St Andrews to the rail network. The Plan seeks to promote travel choice by identifying and supporting a range of transport improvements.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Fife Council should not keep introducing new Structure Plans in advance of the renewal times laid out in previous plans. In addition Fife Council should appoint a much more appropriate number and type of people who actually live in St Andrews who do not have commercial or career interests in development, to the committees involved in drawing up their plans.

Response:

The Approved Fife Structure Plan 2002 (Proposal PM1) makes it clear that the Plan would be reviewed prior to 2006. In view of the lead in times it is impossible to wait for the end date of one plan to start replacement work. Fife Council Committees are comprised of elected members who are subject to a Code of Conduct with respect to any interests they may have. Fife Council has no control over members' place of residence.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

How many pages does Fife Council expect the citizen to seriously study and refer to? There are 490 pages in the documents listed in this consultation exercise.

Response:

Concerns about the extent of the package of consultation documents are noted. As the documents were inter-related it was considered necessary to issue them at the same time. The consultation process is under review to improve consultations in the future.

Action:

Review consultation process.

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Concerned that affordable housing is only affordable to the first purchaser as there are no controls to ensure that the property remains affordable in perpetuity.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the Council will use legal mechanisms and/or Section 75 Agreements. This has been, and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Scheme just for affordable houses with the right number for a mix of rent and buy is required.

Response:

In line with Scottish Executive and Fife Council policy, the Structure Plan seeks to achieve mixed and balanced communities with a range of house types and tenures. Affordable housing should be well integrated with mainstream housing.

Action:

No Change

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

There should be no new expensive houses built.

Response:

The Structure Plan identifies the amount and location of new housing land, with support for the allocation in local plans for a range of sites and tenures. It is for the development industry to prescribe the individual type and price of new development in response to market demand.

Action:

Cameron, Moira - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

There is concern that the economic assumptions on which the draft Structure Plan is based appear seriously flawed. Fife Council's desire to grow Fife by 20,000 people in 20 years in face of a decreasing Scottish population by providing 35,000 new homes and the employment facilities, is optimistic at best. The desired growth figure is double that of the past 20 years with most growth due to inward migration.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

There is no assurance that businesses will locate in Fife which has a business start up rate below the national average. If any of these economic assumptions are incorrect then this ambitious Plan may begin to unravel.

Response:

Fife Council and other appropriate agencies are taking a pro-active approach to improving the Fife economy. The Finalised Structure Plan will be kept under review and every effort will be made to keep to Plan on track.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is considered that Fife Council overemphasises St Andrews as the economic drive for Fife. The emphasis of the Development Plan seems to have shifted from defining what is best for St Andrews and its residents, to treating the town as an economic resource to be exploited for Fife Council's economic gain by seeking to expand tourism and promote spin off companies from the University. In doing so the Plan proposes a level of development that will do irreparable damage to the landscape setting, transport infrastructure and quality of life of this unique medieval town.

Response:

St Andrews is only part, albeit an important one, of Fife Council's aspiration for economic growth in Fife. It is considered that the planned land of growth can be achieved in St Andrews without any attendant damage and the timeous provision of infrastructure secured.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Projective growth rate for St Andrews is well beyond the level of infrastructure of the town can support. The massive inflation in St Andrews housing requirements is in stark contrast to the zero housing requirement to 2011 stated in the approved Structure Plan.

Response:

The specific allocation of land for future development is a function for the Local Plan process. Full account has been taken of the important requirements and this will be addressed in detail via Local Plan, masterplans and development briefs. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Little has changed since the October 1998 Strategic Study which concluded that St Andrews was at its landscape capacity and no major expansion should take place as this would result in an unacceptable impact on the quality of the town environment.

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements. The Scottish Executive has issued a Scottish Planning Policy (SPP) note on Green Belts which updates Circular 24/1985. This has been taken into account in finalising both the Structure Plan and the St Andrews and East Fife Local Plan.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The University cannot expand its undergraduate numbers significantly however it has plans to increase its level of post graduate research activity. This will be on a comparatively small scale and the personnel employed unlikely to be able to afford the types of home that developers would like to build in St Andrews. It is understood that the University needs to manage its land bank to achieve its ongoing aims and it is suggested that any partnership with developers would be beneficial to the University. Whilst the financial well being of the University is important to the town, it is unlikely to be an economic driver on anything like the scale that would justify the massive housing expansion on which it wishes to feed. It is considered that this aspect of the University's planning is undesirably speculative.

Response:

The growth in University associated employment is not principally related to the teaching aspects, rather it is considered there is scope to grow the research and development sector and generate spin-off employment opportunities in both East Fife and Mid Fife.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

The proposed developer led housing expansion offers many adverse impacts on the town's infrastructure and environment. The current population of St Andrews is 10,000 permanent residents bolstered by 7,000 students or so during term time and a comparable number of tourist visitors during the rest of the year. The proposed expansion of the town by 1850 households over the next 20 years is unsustainable in terms of the pressure it will place on schools, health care, traffic and drainage infrastructure. In the absence of transportation links it is unlikely that any increased commuter population is likely to be able to rely on public transport. The proposals will turn St Andrews into even more of a commuter town, leading to increased long distance car commuting which is in violation of Scottish Executive's Transport Hierarchy Fife Council's own Environmental Policies.

Response:

Infrastructure required for new development will be implemented, including developer contributions where appropriate. A distributor road is proposed as part of the expansion of St Andrews.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Support the Council's attempt to provide an adequate supply of affordable housing where it is most needed

Response:

Comment noted.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The proposed developer-led approach to the affordable housing problem, involving massive development with a percentage of affordable housing, has been shown to be unworkable. Such housing ceases to be affordable the first time it changes hands on the open market. Affordable housing must remain affordable.

Response:

The provision of affordable housing through the planning system is a legitimate means of contributing to meeting the needs for affordable housing. This is supported by the Scottish Executive's planning policy. Many local authorities in Britain are using this approach. It is acknowledged however, that the planning system can only make a contribution to meeting the shortfall; it cannot address it in entirety. Further work is being undertaken to reassess the housing land requirement and housing land allocations. Agree that affordable housing should remain affordable. Finalised Plan Policy H4 (Draft Plan Policy H5) addresses this issue.

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The best solution is must lie in a combination of more imaginative strategies. These include Pressured Area Status, housing association schemes, and the new Housestake shared equity scheme.

Response:

Agree. No one single measure will address the need for affordable housing in entirety. The Planning system can make a contribution as can Communities Scotland funding (through Housing Associations). Fife Council is also pursuing a range of other initiatives including reduced Council Tax discount on second homes, the new Homestake Scheme and Pressured Area Status for those parts of Fife with the most acute shortages. Reference to this range of additional measures that the Council is pursuing has been inserted into the supporting text.

Action:

Insert text to outline additional measures being taken.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Houses in Multiple Occupancy

Comment:

The Council should apply more realistic rules to govern absentee landlords who are largely responsible for the problem of HMOs.

Response:

Noted. It is acknowledged that this is an important local issue. However as the Structure Plan is a strategic document, this matter is more appropriately addressed by the Local Plan process, especially the St Andrews and East Fife Local Plan.

Action:

No Change

Comment No: 12

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

It is disappointing that none of the Council's share of money provided recently by the Scottish Executive for affordable housing was earmarked to be spent in St Andrews.

Response:

This is not a land use planning issue however, the funding disbursed by Communities Scotland (CS) is paid to housing associations and in some cases to private developers and not to Fife Council, although the Council does have an influence on where it is allocated. Both Fife Council and CS are well aware of the identified shortage of affordable housing in the St Andrews area. Consequently several developments have been financed in the area in the last few years. Recent projects in the area amount to £5 million investment from CS. Fife Council and CS are constantly reviewing the land available in the St Andrews area and funding has been provided to Kingdom Housing Association to identify future opportunities for affordable housing.

Action:

Fontes, Sheila - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Structure Plan appears to completely ignore the 1998 Strategic Study which concluded that no major expansion should take in St Andrews and that if the quality of the town's environment was under threat from traffic congestion that if anything the current situation is worse for St Andrews than it was in 1998.

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The notion of St Andrews being an economic driver for the whole of Fife is alarming.

Response:

Disagree. It is considered that St Andrews has an important role to play in creating employment opportunities.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Residents will reaffirm that the infrastructure of the town mainly the schools, central shopping area and the access roads have become overwhelmed. Adding a further 1800 houses, all involving car ownerships, prior to solving the main infrastructure problems will produce chaos and gridlock.

Response:

The specific allocation of land for future development is a function for the Local Plan process. Full account has been taken of the important requirements and this will be addressed in detail via Local Plan, masterplans and development briefs. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

St Andrews needs genuine affordable housing which will remain affordable beyond the first owners / tenants. Not confident that Fife Council can provide a long term affordable housing scheme for St Andrews.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the Council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Current developments have been aimed at a migrating population (surely a low priority) and student landlords.

Response:

Disagree. The Structure Plan identifies the amount and location of new housing land, with support for the allocation in local plans for a range of sites and tenures.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Density

Comment:

It is considered that St Andrews has a higher density of population than any of the major cities in Scotland.

Response:

Concern noted. The density Policy H6 in the Finalised Structure Plan (Draft Plan Policy H8) is required to ensure appropriate densities are planned for new housing development in appropriate locations.

Action:

Fontes, Stephen - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Structure Plan appears to completely ignore the 1998 Strategic Study which concluded that no major expansion should take place in St Andrews and that the quality of the town's environment was under threat from traffic congestion. If anything the current situation is worse for St Andrews than it was in 1998.

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The notion of St Andrews being an economic driver for the whole of Fife is alarming.

Response:

Disagree. It is considered that St Andrews has an important role to play in creating employment opportunities.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Residents will reaffirm that the infrastructure of the town mainly at the schools central shopping area and the access roads has become overwhelmed. Adding a further 1800 houses, all involving car ownership, prior to solving the main infrastructure problems will produce chaos and gridlock.

Response:

The specific allocation of land for future development is a function for the Local Plan process. Full account has been taken of the important requirements and this will be addressed in detail via Local Plan, masterplans and development briefs. In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projections of 9.1% growth, are realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section of demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

St Andrews needs genuine affordable housing which will remain affordable beyond the first owners / tenants. Not confident that Fife Council can provide a long term affordable housing scheme for St Andrews.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the Council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and has been addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Current developments have been aimed at a migrating population (surely a low priority) and student landlords.

Response:

Disagree. The housing land requirement is calculated to primarily reflect local housing demand and needs. The issue of who purchases a particular property is outwith the remit of land use planning.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Density

Comment:

It is considered that St Andrews has a higher density of population than any of the major cities in Scotland.

Response:

Concern noted. The density Policy H6 in the Finalised Structure Plan (Draft Plan Policy H8) is required to ensure appropriate densities are planned for new housing development in appropriate locations.

Action:

Clark, C - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

The level of house building proposed for St Andrews is totally unacceptable. It is inconsistent with the findings of the 1998 Strategic Study which rejected major expansion of the town. It would be impossible to accommodate the proposed new building without irrevocably damaging the landscape setting of St Andrews and its unique mediaeval character. Environmental impact would be disastrous, contradicting Fife Council's own sustainability policy. Any actions detracting from the beauty of the town would have a detrimental effect on the town's ability to attract visitors and in addition would contribute to the detriment of the guality of life for the town's residents.

Response:

The delineation of development areas in the Draft Area Local Plan has taken full account of the landscape and other issues. The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

The 2002 Structure Plan identified a Green Belt for St Andrews to preserve the landscape setting and prevent large scale urban expansion. The Green Belt was to encircle the town and was mandated by the Scottish Executive. These stipulations are missing from the new draft Structure Plan and it is considered that this document should contain exactly the same Green Belt policy for the centre of St Andrews as the previous plan. Nothing has occurred to justify any changes to this policy.

Response:

The landscape issues have been fully considered as part of the process of delineating the St Andrews Green Belt boundary. Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries. Significant changes have taken place which require provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

Action:

Policy and text amended.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

The road infrastructure in St Andrews is currently struggling to cope with the levels of traffic at peak times and could not cope with additional levels of local traffic generated as natural consequence of the proposed level of the new house building. The existing school provision within St Andrews is quite inadequate to support the increased school rolls resulting from the building of traditional houses. Current health service provision within the town could not cope with the increasing demand from new housing. The existing problems of poor drainage within some areas of the town could be further exacerbated by the proposed new housing developments.

Response:

It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

There is insufficient numbers of jobs locally to support the proposed massive housing development in St Andrews as sufficient new jobs are not likely in the future. The result is that the occupiers of new houses are likely to be commuters, travelling to and from West Fife and beyond on a daily basis. This will greatly increase road traffic locally and across Fife and be detrimental environmentally. In addition this is in contradiction to the Council's sustainability policy. New housing in Fife should be relocated to areas where there are jobs.

Response:

The housing requirements include meeting the needs of those working in the town at present who cannot, for whatever reason, live there. It is considered that St Andrews has the potential to contribute to the generation of new employment opportunities.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Structure Plan repeatedly refers to St Andrews World Class which appears to be an organisation comprising Fife Council in a number of local businesses. This organisation is not accountable to and has not consulted with the people of the town.

Response:

The organisation is led by Scottish Enterprise Fife and involves Fife Council and a number of local businesses and organisations and cannot be accountable as suggested. However, it must take account of local opinion as its proposals for the town are formulated in due course.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Structure Plan describes St Andrews as an economic driver for the whole of Fife and appears to regard the town as a cash generator. St Andrews is home to many thousands of people and it is considered that protection of the local environment and the needs of the residents of the town should come first and foremost.

Response:

It is considered that St Andrews has the potential to play an important role in generating significant employment opportunities. A balance has to be struck between the requirements for Fife as a whole and local requirements/aspirations.

Action:

MacGregor, Kim - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

The level of house building proposed for St Andrews is totally unacceptable. It is inconsistent with the findings of the 1998 Strategic Study which rejected major expansion of the town. It would be impossible to accommodate the proposed level of new building without irrevocably damaging the landscape setting of St Andrews and it s unique mediaeval character. Environmental impact would be disastrous, contradicting Fife Council's own sustainability policy. Any actions detracting from the beauty of the town would have a detrimental effect on the town's ability to attract visitors and in addition would contribute to the detrimental of the quality life for the town's residents.

Response:

The numbers have been reviewed in the Finalised Plan. The delineation of development areas in the Draft Area Local Plan has taken full account of the landscape and other issues. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

The 2002 Structure Plan identified a Green Belt for St Andrews to preserve the landscape setting and prevent large scale urban expansion. The Green Belt was to encircle the town and was mandated by the Scottish Executive. These stipulations are missing from the new draft Structure Plan and it is considered that this document should contain exactly the same Green Belt policy for the centre of St Andrews as the previous plan. Nothing has occurred to justify any changes to this policy.

Response:

The landscape issues have been fully considered as part of the process of delineating the St Andrews Green Belt boundary. Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries. Significant changes have taken place which require provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

Action:

Policy and text amended.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

The road infrastructure in St Andrews is currently struggling to cope with the levels of traffic at peak times and could not cope with additional levels of local traffic generated as natural consequence of the proposed level of the new house building. The existing school provision within St Andrews is quite inadequate to support the increased school rolls resulting from the building of traditional houses. Current health service provision within the town could not cope with the increasing demand from new housing. The existing problems of poor drainage within some areas of the town could be further exacerbated by the proposed new housing developments.

Response:

It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

There is insufficient numbers of jobs locally to support the proposed massive housing development in St Andrews as sufficient new jobs are not likely in the future. The result is that the occupiers of new houses are likely to be commuters, travelling to and from West Fife and beyond on a daily basis. This will greatly increase road traffic locally and across Fife and be detrimental environmentally. In addition this is in contradiction to the Council's sustainability policy. New housing in Fife should be relocated to areas where there are jobs.

Response:

The housing requirements include meeting the needs of those working in the town at present who cannot, for whatever reason, live there. It is considered that St Andrews has the potential to contribute to the generation of new employment opportunities.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Structure Plan repeatedly refers to St Andrews World Class which appears to be an organisation comprising Fife Council and a number of local businesses. This organisation is not accountable to and has not consulted with the people of the town.

Response:

The organisation is led by Scottish Enterprise Fife and involves Fife Council and a number of local businesses and organisations, and cannot be accountable as suggested. However, it must take account of local opinion in due course as its proposals for the town are formulated.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Structure Plan also describes St Andrews as an economic driver for the whole of Fife and appears to regard the town as a cash generator. St Andrews is home to many thousands of people and it is considered that protection of the local environment and the needs of the residents of the town should come first and foremost.

Response:

It is considered that St Andrews has the potential to play an important role in generating significant employment opportunities. A balance has to be struck between the requirements for Fife as a whole and local requirements/aspirations.

Action:

Adam, Roma - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

There is considerable concern about the impact of the proposed development would have on the quality of life in St Andrews. It is noted that the Strategic Study published in 1998 concluded that St Andrews was at its landscape capacity and that no major expansion should take place. The study also noted concerns about the traffic congestion issues and the situation has considerably worsened since the publication of the study. Further, projected development to 2026 will make the present problems an insignificance.

Response:

Concerns noted. The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements. Properly planned and controlled development will ensure that change will not result in degradation of the town.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Cynical about Fife Council's change of policy however it must be prompted by the Scottish Executive's National Planning Framework document which has effectively targeted St Andrews as an economic dripping roast as a leisure destination and a centre of excellence with an international profile. St Andrews already has an international reputation and it is considered that proposals are a classic case of commercial exploitation without due regard to the social consequences. The impact of development on amenity, environment and landscape would be incalculable and would subsequently destroy the international reputation the town already enjoys as a pleasant place to live and visit.

Response:

Fife Council must take full account of National Planning Framework as well as other Scottish Executive guidance. Properly planned and controlled development will ensure that change will not result in any degradation of the town.

Action:

Wilson, Johnathan & Margaret - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Object to the proposed expansion of St Andrews because of the following reasons:

- 1. The town centre is not able cope with any further traffic as even outwith the tourist season there is gridlock.
- 2. Madras College is already overfull and, until an additional secondary school is built, there must be no extra housing in the Madras catchment area on the scale envisaged in the plan.
- 3. Parking in the town centre is already difficult and influx of residents as scale proposed will make it impossible unless a multi-storey car park is built or a frequent, reliable, reasonably priced public transport system is provided.

In addition the St Andrews golf courses are operating at full capacity and further housing and the scale proposed will only increase the demand for season tickets beyond levels it cannot currently meet.

Response:

The delineation of development areas in the Draft Area Local Plan has taken full account of the landscape and other issues. There are many golf courses in Fife and the surrounding areas which would allow visitors the opportunity to play golf if they are unable to play within the town.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

It is considered that protection should be given to the skyline of St Andrews which is a beautiful, ancient, historic town, unique town in Scotland. It should not fall prey to the never-ending demands of developers investors who have no interest in preserving the special character of St Andrews.

Response:

The allocation of land for future development in St Andrews in the Area Local Plan has/will take full account of the landscape setting.

Action:

Baxter, Jean - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Object to the Structure Plan on the grounds that it is ill judged and does not take into account the fact that St Andrews has already reached saturation point with regard to traffic. In addition there are inadequate facilities, particularly water supply. Traditional development cannot be served if these supplies are inadequate.

Response:

The specific allocation of land for future development is a function for the Local Plan process. Full account has been taken of the important requirements and this will be addressed in detail via Local Plan, masterplans and development briefs. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Everybody agrees that affordable housing is crucial but there are no legal safeguards that it will remain affordable after the first change of ownership.

Response.

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the Council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and has been addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Lip service has been made to the idea of a Green Belt but there are no safeguards to ensure it will not be sacrificed to yet more development.

Response:

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which also identify the boundaries.

Action:

Policy and text amended.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The purpose of the proposed development is not clear. At one moment it appears that St Andrews is a great tourist attraction/a world class site etc, but none of the emerging proposals are designed to encourage people to come here.

Response:

The purpose of development is to meet identified needs for St Andrews. Fife Council must take full account of National Planning Framework as well as other Scottish Executive guidance. Properly planned and controlled development will ensure that change will not result in any degradation of the town.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

There has been a lack of clarity and information in the consultation process. Population figures for St Andrews have not been agreed and it is not clear if they include or exclude students.

Response:

Fife Council attempted to make the process of consultation as clear and as informative as possible and will review this process in the light of the comment received. Population figures are being examined and they do include students. A corporate exercise is required in order to ensure that every Fife Council Service uses the same figures and the concerns that lack of consistent data causes should be addressed.

Action:

Review consultation process.

MacGregor, DF - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Object to the proposals of the draft Structure Plan for a proposed development in St Andrews. Specifically there is concerns that St Andrews cannot cope with extra traffic that would be generated and this would result in the destruction of precisely what is worth preserving within the historic town. In addition the planning process ignores the importance of preserving the southern hillside which is contrary to the previous approach adopted. Fife Council need to guarantee that the southern slopes will be covered with houses.

Response:

The specific allocation of land for future development is a function for the Local Plan process. Full account has been taken of the important requirements and this will be addressed in detail via Local Plan, masterplans and development briefs.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The Plan does not indicate the housing land requirement for St Andrews nor does it indicate how many more can be built given the constrained town centre and restricted services. Of particular concern is the repeated flooding events associated with the Kinness Burn. In addition there is need for a new secondary school in the north of Fife.

Response:

The Structure Plan identifies the broad amount and location of new housing land, with Local Plans identifying sites for development. The required detail for St Andrews is more properly addressed by the St Andrews & East Fife Local Plan. Comments will be addressed in this context.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

It is agreed that there is a need for some housing and as much as possible of an affordable nature; that is to say generally affordable to local people. It is considered Fife Council should turn its mind to achieving that, instead of capitulating to developers of luxury housing. Fife Council should be lobbing the Government to modify right to buy provisions.

Response:

The scale of the affordable housing shortage in Fife is such that Communities Scotland investment is unable to address it in entirety. In such situations the planning system can make a legitimate contribution through the delivery of mainstream housing, which will take the form of a mixture of house types. The aim should be to achieve a mixed, balanced development with a range of house types. Fife Council will be pursuing the suspension of Right-to-Buy in pressured areas including St Andrews.

Action:

Outram, Anne - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Concerned about the planned houses to be built by 2026. St Andrews is a small town and infrastructure cannot cope with the demands on drainage and increasing traffic which would result from building these new houses. In addition such an expansion would seriously affect the historic character of the town and once this is destroyed St Andrews is likely to simply become a dormitory town for Edinburgh and Dundee.

Response:

The specific allocation of land for future development is a function for the Local Plan process. Full account has been taken of the important requirements and this will be addressed in detail via Local Plan, masterplans and development briefs. It is considered that the town historic centre will not be destroyed and that there is potential for St Andrews to play a role in encouraging new employment opportunities.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Could Fife Council not simply build 419 council houses for those who are on the housing waiting list? In the past, St Andrews Town Council built Council houses and rented these. Fife Council already owns land in St Andrews and this should be used for that purpose. Affordable housing provided by developers is not a solution.

Response:

In addition to the Council's Waiting List, there are those who are on the waiting list of housing associations and those households who do not see Council/housing association accommodation as meeting their needs. Current Fife Council policy is not to build Council housing, due to right-to-buy legislation, but this may be reviewed in due course. The Council is already using some of its surplus land to facilitate affordable housing. The scale of the affordable housing shortage in Fife is such that Communities Scotland investment is unable to address in entirety. In such situations the planning system can make a legitimate contribution through the delivery of mainstream housing which will take the form of a mixture of housing types.

Action:

Stephenson, - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Concerned about the proposed number of houses to be built which would increase the population by approximately 30% thereby extending the boundaries of the town.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. St Andrews is identified in the Finalise Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is considered that the character of the town has changed with shops being replaced with restaurants, coffee shops and a myriad of charity shops. If the last thirty years is anything to go by Fife Council has failed to attract new development into the town and the plan does not appear to indicate how it will provide the change to stimulate future business growth.

Response:

Town centres are dynamic locations and the planning system cannot preserve a location at any point in time. The Structure Plan sets the framework for action by a number of mechanisms and agencies to achieve the desired results.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

It is not clear why Fife Council has seen fit to overturn the Green Belt Policy for St Andrews established in the 2002 Structure Plan. If this was the correct decision at the time what has caused this major shift in policy?

Response:

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries.

Action:

Policy and text amended.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

There is concern about the approach to affordable housing, in that the developer gets planning permission to build a certain number of private dwellings and in return provides a number of affordable houses. This is the wrong way to tackle the affordable housing problem. If there is a genuine need for affordable housing and there is full support for providing these then only these affordable houses should be built.

Response:

There is a range of measures to provide affordable housing, which Fife Council is pursuing actively. Communities Scotland investment through housing allocations can also make a contribution. However the scale of affordable housing shortage in Fife is such that investment is unable to address it in entirety. In such situations, the planning system can make a contribution through the delivery of mainstream housing, which will take the form of a mixture of house types. Building only large numbers of affordable houses would not promote a mixed and sustainable community.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Fife Council clearly fails to demonstrate how affordable houses will remain affordable and, if this is not clear at the outset the affordable will soon become unaffordable and there will be a return to square one.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the Council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and has been addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is not clear what is meant by the turn of phrase "St Andrews World Class". The reason St Andrews is a major venue in tourist attraction is plain and simple The Old Course and the other marvellous golf courses in the locality. Take them away and there is very little left. Thankfully the links are free from Council interference and are managed to ensure that golfing visitors will continue to visit the town for many years to come.

Response:

The organisation is led by Scottish Enterprise Fife and involves Fife Council and a number of local businesses and organisations and cannot be accountable as suggested. However, it must take account of local opinion in due course as its proposals for the town are formulated. Other comments noted.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

I am of the opinion that Fife Council has been extremely devious in the way that both the Structure Plan and St Andrews Local Plan have been published at the same time. This is a deliberate and mischievous act designed to confuse the public. It is not clear how many people realise that once the Structure Plan is passed it signals a green light for the St Andrews plan to move forward. Therefore anyone objecting to the St Andrews plan is, by default, giving assent to the Structure Plan. Those responsible for this contemptuous act should seriously consider their position so that they are not serving the public who pay their wages.

Response:

The documents were published at the same time to allow the strategic context and local detail to be considered simultaneously. The role of the Structure Plan is strategic and does not provide site specific details. The role of the Structure Plan is explained in the introduction section of the Finalised Structure Plan with regard to its role in relation to Local Plans.

Action:

Dowie, Joan - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

It is considered that development on the scale proposed structure plan would utterly ruin the landscape setting that attracts so many visitors to St Andrews. If the setting is not protected, St Andrews will look like any other village that has had to bear uncontrolled urban sprawl and will no longer look world class.

Response:

The numbers have been reviewed and finalised in the Finalised Plan. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Fife Council requires no reminder about the plight of Madras College and its annex. It is questioned why plans for a new school will not be settled before the plans for the development of new houses.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The provision of affordable housing has only hope of succeeding if strict measures are laid down to ensure that local youngsters/key workers are served first and on no account can the houses be sold off after a year or so.

Response:

This is not a land use planning issue although it is addressed in the Implementation Guide on affordable housing produced by Fife Council's Housing Service, which sets out the priority groups, especially those with local connections. It is Fife Council's aim that local need should be met as locally as possible and within the same housing market area, wherever possible. However provision must also be made for other groups such as incoming workers.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Of the opinion that the whole Structure Plan for St Andrews is University driven, and Fife Council has seized on an opportunity to generate a good income from St Andrews without spending anything themselves .

Response:

The plan is development, not developer driven. In the partnership approach adopted by Fife Council means it has to make a financial commitment to development.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Directly concerned about the way that the chairperson at the St Andrews public meeting selected people who they knew to ask questions. Even more saddened and dismayed at the way these questions were not answered. I have never heard so much gobbledegook in my life and frankly it scared me. The lies, deceit and refusing to answer simple questions was despicable.

Response:

The chair of the St Andrews meeting had to chair the meeting within the time available. However, Fife Council officials were available beyond this period to answer questions people wished to raise. Your opinions on the meeting are noted. Every question was answered honestly with the information which was to hand.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

At present St Andrews is heading for an unbalanced community with youngsters unable to even rent, let alone buy, a property in the town. What is wrong with the council building more houses, like it used to, and not ever selling them? Does the description world class mean a community with only people who can afford executive type houses?

Response:

Fife Council wishes to ensure, a far as is possible, that communities are mixed, balanced and diverse. The issue of Council housing is not land use planning related. Current Fife Council is not to build social rented housing due to right-to-buy legislation, but this may be revised due course. The Council is currently pursuing Pressured Area Status for those areas with the most acute shortage of affordable housing, including St Andrews.

Action:

Sprot, Ralph & Celia - Peat Inn, Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is considered that the plan has come at the time when there is a significant property boom with St Andrews as a hot spot. This supports the idea that developers would like to build houses and that the case for house building in St Andrews in particular is driven by that rather than an analysis of local needs.

Response:

The Plan is development, not developer driven.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

The theme of the plan is one of growth in population for Fife at a time when Scotland is losing population. This means enticing people form neighbouring areas who will then have to commute (as they already do from Drumoig and Dalgety Bay) to Tayside and the Lothians thereby causing traffic congestion and pollution etc.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

It is considered there should be a Green Belt that goes round the coast and therefore includes the golf courses. This should be defined in a watertight way to exclude non Green Belt development and permit green usage such as parkland. It is considered that St Andrews needs a decent parkland area (including flat grassed area for sports). Most English towns of this size would have a facility like this. Parks should be free to the public and not to be a commercial theme or play area as is proposed for Craigtoun.

Response:

The St Andrews Green Belt has been delineated in the draft Area Local Plan taking account of all the relevant issues. The identification of an area for parkland is an issue to be addressed in the Area Local Plan.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Proposal to build housing in the Tay Bridgehead area is unnecessary and illogical. It is merely the creation of commuter/dormitory housing for Dundee (which could do with regeneration of its own housing stock). Dundee City Council are rightly concerned about Structure Plan proposals and even though Fife's duty is to consider itself first, it would be highly laudable (if not common sense) if Fife were to consider and discuss with Dundee any such proposals that might affect the area. The greatest issue of importance in the Tay Bridgehead area is the provision of a secondary school and other social services.

Response:

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan. The delineation of development areas in the Draft Area Local Plan has taken full account of the landscape and other issues. It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Coast

Comment:

Along the area between St Andrews and Fife Ness there should be a moratorium on any coastal development. The south coast of Fife has been comprehensively over developed and it is considered that this remaining part which is outstandingly beautiful should be preserved with attention given to coastal walking etc.

Response:

Policies dealing with the coast are now Local Plan Policies and will be contained in emerging Area Local Plans. Much of the coastline between St Andrews and Fife Ness is likely to be designated as undeveloped coast which is afforded appropriate protection.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Cupar would greatly benefit from a bypass and this is a noticeable omission from the Structure Plan.

Response:

Potential for a relief road to be delivered in Cupar by housing and mixed use development to the north of the town is reflected in the Finalised Structure Plan and will be considered in the St Andrews and East Area Local Plan.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Cupar

Comment:

It is considered that increased housing in Cupar will help regenerate the town, although the provision of employment is considered to be even more important for the town.

Response:

Cupar is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,450 new houses are proposed at Cupar over the next 20 years, with 1,200 being on greenfield land to the north of the town to facilitate a relief road. This allocation of 1,450 new houses is an increase from the consultative Draft Plan, which identified 600 - 1,000 houses over the same period. This change has been made in response to the comments received on the consultative Draft Structure Plan together with the need to provide a relief road and affordable housing in the town. The St Andrews and East Fife Local Plan will address the issue of identifying sites for employment purposes.

Action:

Housing allocation increased from 600–1,000 to 1,450 in Finalised Plan.

Harris, Deborah - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Question the basis for Fife Council's view that St Andrews must expand in order to prosper. In the context of the Strategic Study which categorically stated that new development in the St Andrews area was not feasible as St Andrews was at its landscape capacity and no further expansion should take place as this would result in unacceptable impact in the quality of the town environment. There is also an absence of economic drivers as the University has ignored plans to expand its undergraduate population and there are no other development proposals in the area. In this event there is no concrete reason to suppose that St Andrews will experience a dramatic increase in population in the immediate future. Present circumstances favour the approved 2002 Fife Structure Plan which recommends that there should be no new housing in St Andrews until 2011 and then only subject to review.

Response:

Comments noted. The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements. The housing requirements include meeting the needs of those working in the town at present who cannot, for whatever reason, live there. It is considered that St Andrews has the potential to contribute to the generation of new employment opportunities.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

The vast bulk of documentation involved in the deliberations is deplorable. Mere volume of words is not synonymous with clarity of expression or quality of information. This is attested to by the fact that these documents bandy about phrases like 'affordable housing' and 'St Andrews world class' without stating what these terms are meant to denote. Whatever else was certain, any vagaries of language in the final plan will render it vulnerable to reinterpretation by outside business entities at the expense of local interests in St Andrews.

Response:

The Draft Structure Plan was in the public domain from late November 2004 onwards. It was considered helpful to publish the Structure Plan and Local Plan at the same time. However, your comments are noted and this matter will be addressed in future consultations. Affordable housing is defined in the Structure Plan Glossary. The text in paragraph 1.16 of the Draft Structure Plan is intended to make clear the St Andrews World Class proposal. There may be some confusion arising from the fact there is an organisation called St Andrews World Class which is a partnership led by Scottish Enterprise Fife and including Fife Council, other businesses and local organisations. Concerns about wording noted however, Plans are required to be clear to all readers.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

With regard to the present consultations it is strongly urged that priority should be given to a) reinforcing the Green Belt proposals formulated by Alison Grant in March 2003: b) explicit clarification of all currently vague terms so that it leaves no ambiguities which might subsequently be exploited by ambitious developers whose interest in the future of St Andrews begins and ends with speculation for profit.

Response:

The Green Belt for St Andrews has been delineated in the draft Area Local Plan and has taken into account the input by Alison Grant. The Structure Plan and Local Plans are statutory but not legal documents. Definitions in glossaries are intended to assist the reader and cannot be used in a legal context.

Action:

Baird, Marianne - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

The so-called consultation time has been extremely short considering the mountain of paper published. Expecting the unfortunate public to spend yet more time filling in forms and searching for paragraph numbers gives the impression that Fife Council was trying to impose rules of how to object as well as to impose the context of the plan. If this is a truly democratic exercise, Fife Council must accept all written objections in whatever form members of public wish to submit them. Form filling is not an easier option especially as each separate form requires the same information about the objector each time.

Response:

The documentation was inter-related and required to be issued at the one time. It was considered that publishing the Structure Plan and Local Plan simultaneously would be helpful but comments about value of material noted. The suggested use of forms was considered to be helpful to consultees and to Fife Council to aid clarity and avoid ambiguity. There was no compulsory use of forms. Fife Council has accepted written comments in a wide range of formats.

Action:

Review of consultation process.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

The contents of the 1998 St Andrews Strategic Study and the previous Fife Structure Plan indicated that there was neither scope on the landscape in environmental terms not development or a requirement for new housing in St Andrews until 2011. It is considered that the housing land allocation in the draft Structure Plan although designated as medium scale growth, is considered to be major growth. There is no indication given in the plan as to why there has been a change in circumstances since the approval of the Structure Plan in 2002. There appears to be no increase in potential for local employment and it appears that the proposed housing is merely for commuters to Edinburgh, Perth and Dundee.

Response:

The numbers have been reviewed and confirmed in the Finalised Structure Plan. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Infrastructure

Comment:

Draft Structure Plan fails to explain how St Andrews with its restricted town centre, already plagued with traffic congestion and severe parking problems, overcrowded schools and over stretched public services, is going to be able to overcome current difficulties and cope with such a rapid increase in population.

Response:

It is the intention to ensure that the appropriate level of infrastructure and other services required will be provided at the appropriate time. Fife Council with partners continue to further training and education opportunities. The Fife Economic Development Strategy "Growing Fife's Future" sets out a number of actions in this regard. The issue of public transport network will be addressed via the Local Transport Strategy and Area Transport Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Draft Plan states that 45% of new houses will be affordable housing but fails to explain how this will be achieved.

Response:

The percentage requirement for the St Andrews housing market area has been revised in the light of PAN 74, the public consultation and the updated Housing Needs and Affordability Study. The Plan can only address land use issues and consequently focuses on the contributions that can be achieved through the planning system. Fife Council is also pursuing a range of other measures to address the shortfall but these are not land use related.

Action:

Change percentage requirements in Finalised Plan Policy H4 (Draft Plan H5).

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Structure Plan seeks to provide the framework for the level of long term growth for St Andrews and is continuous referring to the need to develop St Andrews as a world class destination with the shops focusing on tourism and visitors related retailing. The needs of the residents appear to have been totally ignored.

Response:

It is not intended that the plans for promoting St Andrews should be implemented at the expense of reducing shops and services for local residents.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

St Andrews attracts tourists because of its setting and the historic core as well as the golf courses. The expansion outlined in the Structure Plan can only be achieved by ruining the landscape setting of the town and ignoring the previously agreed policy of a full Green Belt encircling the town.

Response:

The boundary of the St Andrews Green Belt is delineated for the first time in the draft Local Plan. The Green Belt is designated to provide for necessary development and secure other policy objectives.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

Fife Council's desire to see Fife grown by 20,000 people in twenty years in face of a decreasing Scottish population by providing 35,000 new homes and employment facilities is highly optimistic to say the least. It is not clear why businesses should locate in Fife when it currently has a business start up rate below the national average. The Plan provides no reasons for choosing St Andrews as an economic driver for Fife - Mid and South Fife are in far greater need of economic expansion. The only people who are going to gain economically for this rapid expansion of St Andrews are the developers.

Response:

Concerns about economic assumptions and population growth noted. Business relocation and start-up rates are two separate issues. The first is addressed by providing suitable conditions for businesses to have the confidence to move to Fife. The second requires being supportive to those people looking to start up new businesses. St Andrews has been identified in the National Planning Framework as an economic driver and it is intended that any new development will be planned in such a way so as to prevent damage to the town and its surroundings.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

A house that is affordable for a low income family is equally affordable to a rich golfer seeking a second or holiday home.

Response:

This is not a land use comment but the issue of priority groups is addressed in the Implementation Guide on Affordable Housing. This seeks to ensure that those most in need of affordable housing are given priority.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Houses in Multiple Occupancy

Comment:

The current problem in St Andrews is trying to accommodate the student population which has resulted in 50% of the homes in the town centre now being owned by external landlords and let to students as houses in multiple occupation (e.g. several ex-council houses and flats in the recently built new blocks).

Response:

Noted. It is acknowledged that this is an important local issue. However as the Structure Plan is a strategic document, this matter is more appropriately addressed by the Local Plan process, especially the St Andrews and East Fife Local Plan.

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Affordable houses that were built 2 to 3 years ago are now changing hands at double the original price. Any plans for the future should start by looking at the current situation. What is needed is to solve the existing problems, as ignoring them is just going to exacerbate the problem.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

Poole, Julie - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

The meeting at St Andrews on 20th April ended in a slow hand clap by the audience who repeatedly had their questions side tracked. There was particular concern about a lack of a definitive response to the question about the population of St Andrews as to whether it included students or not.

Response:

The answers given at the meeting were an honest response however, many of the questioners were unhappy with the answers given. The population figure for St Andrews do include students.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

There is concern about the proposed sharp increase in housing in St Andrews at the same time as the declining Scottish population and a levelling out in St Andrews University student figures. There is concern that the housing demand is not indigenously led but developer driven. It is considered that the infrastructure would be unable to cope and that the impact on the landscape would be unacceptable.

Response:

Housing need figures calculated by Fife Council using Scottish Executive specified methods. It is considered that there is support for St Andrews to play a vital role in encouraging new employment opportunities.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section of demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

No change in planning for 5% growth.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Would welcome affordable houses for locals.

Response:

General support noted. The Implementation Guide on affordable housing sets out priority client groups. Meeting local needs will be an important element of this approach. However, provision must also be made for other groups such as incoming workers.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

It is considered that until there is a shuttle bus at Leuchars rail head, or a tram or monorail, St Andrews will never become World Class. To have international golf, University and tourist facilitates so badly served by train and plane is parochial.

Response:

Proposal PT1 of the Finalised Structure Plan (PT2 of the Draft Plan) refers to options to connect St Andrews to the rail network.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

It is considered that multiple occupancy and vehicles owned by their residents have finished off the now shabby St Andrews town centre.

Response:

Although important, HMOs are not a strategic land use planning issue and will be addressed by the St Andrews and East Fife Local Plan. However, the Finalised Plan is supportive of St Andrews town centre. A more detailed approach will be provided through the St Andrews and East Fife Local Plan.

Action:

Grinyer, Peter - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

It is considered the infrastructure of the town, particularly in the town centre, will be even more overloaded if the population increases as proposed over the next ten to twenty years. The character of the town has deteriorated over the last 25 years, particularly due to the volume of road traffic, caused largely due to the new housing and a large increase in student numbers at the University. In addition it is noted that the secondary school is already overcrowded and a new one must be built before any expansion of secondary school population in the area could be envisaged.

Response:

The specific allocation of land for future development is a function for the Local Plan process. Full account has been taken of the infrastructure requirements and this will be addressed in detail via Local Plan, masterplans and development briefs. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Tourism

Comment:

Should be aware that one of the main attractions of St Andrews particularly for visitors is the golf courses. In recent years the number of students and local people using the courses has increased resulting in fewer visitor starting times being available. Additional new houses would result in more local golfers and less opportunities for visitors to use the golf facilities in the town reducing its visitor attraction.

Response:

The restriction mentioned only applies to a limited number of courses. There is a whole range of opportunities for people visiting Fife to play golf in Fife and in the surrounding areas.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

The proposed substantial new housing estates at the west end of St Andrews could adversely affect the views on entering the town by the Strathkinness High Road, Strathkinness Low Road and Craigtoun Road. In addition any major increase in housing would erode the Green Belt both at the south and west perimeters of the town.

Response:

The boundary of the St Andrews Green Belt as proposed in the ST Andrews and East Fife Local Plan has been drawn taking full account of the landscape issues and views in and out of the town's historic core.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

New housing on the edges of St Andrews would significantly increase the traffic volume resulting in greater road safety problems rising from the condition of the roads, parked vehicles and cyclist/pedestrian/vehicle conflict.

Response:

These are detailed issues to be addressed via the Local Transport Strategy and Area Transport Plan. However, traffic issues would be fully addressed for new areas via Area Local Plan, Master Plans and development briefs.

Action:

Docherty, J T - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Lack of consideration given to the preservation factor for St Andrews in the Structure Plan. The town centre has hardly changed in a hundred years yet there's an ever expanding area around it. Fife Council, with no awareness of it happening and therefore no policy of controlling it, has allowed a gross overpopulation by students of the central conservation area. The sustainable mix has been destroyed with hardly a young family left in the area.

Response:

Disagree that no consideration is given to preservation of St Andrews. However, no town can remain totally static and it is considered that benefits will derive from properly planned development.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

The Green Belt was supposed to be a main feature of control for the future of our atmosphere. However before it is even an entity the planners and developers are carving it up for a frighteningly large increase in housing numbers.

Response:

The boundary of the St Andrews Green Belt is delineated for the first time in the draft St Andrews and East Fife Local Plan. The Green Belt is designated to provide for necessary development and secure other policy objectives. Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

What is required for St Andrews is a common sense approach in order to ensure the town is preserved for future generations instead of being used as a development area. Either we get it right now, or hope what we still have will last forever. Request planners to listen to all the objections and comments that come from the people who actually stay in the town and act responsibly in their interests.

Response:

Properly planned development will ensure that the good points of the town will be secured as well as necessary new development. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Napier, Robert - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

It is not clear why the Structure Plan does not set out the Green Belt policies put forward in the Scottish Office Green Belt Circular of 1985. In addition Fife Council's statement is unsatisfactory because it only reflects its own weaker plans and not the Scottish Executive's Green Belt policy. House building proposals make a mockery of the idea of a Green Belt encircling St Andrews in order to protect its landscape setting.

Response:

The detailed Green Belt Policy guidance referred to is contained in the draft St Andrews and East Fife Local Plan, which complies with Government guidance. The Scottish Executive has recently issued a Scottish Planning Policy (SPP) note on Green Belts which updates Circular 24/1985. This has been taken into account in finalising both the Structure Plan and the Local Plan.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The designation of St Andrews as an area for medium growth is misleading since it masks what it will in effect be a high growth for a small town.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

It is not explained clearly in the Plan why St Andrews needs so much new housing and how the figure quoted is justified. It is not clear why a zero shortfall until 2001 set out in the approved Fife Structure Plan 2002 has become need for additional houses by 2011. In addition the St Andrews Strategic Study advised that St Andrews was at its landscape capacity. Use of St Andrews and East Fife to solve problems in other areas could be misguided - particularly when no adequate explanation is given.

Response:

The justification for new development is contained in the Report of Survey. The 1998 Study was to inform the replacement for the 1994 Structure Plan, which was approved in 2002. Significant changes have since taken place, which require the provision of land for new development for the period 2006-2026.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Questions the reasons behind the increased housing and population figures which were raised at the meeting on 20th April. Fife Council's staff at the meeting did not answer these questions in a satisfactory way.

Response:

The Draft Structure Plan clearly set out the reasoning behind the proposed housing allocations and population figures. Additional information is contained in the Report of Survey, however this was expanded in the Finalised Plan documentation . The answers given at the meeting were an honest response however, many of the questioners were unhappy with the answers given.

Action:

Expand supporting information.

Smith, Kenneth - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

There is concern about some of the proposals for the dramatic expansion of St Andrews which, if implemented, could lead to the construction of approximately 1800 new houses over a relatively short period. The justifiable grounds for such an expansion are not clearly stated and cannot be justified on the basis of a possibility of increase in employment opportunities in the town or in the surrounding areas. It is likely that the bulk of new houses will be bought by people moving into the St Andrews area and working elsewhere or coming to St Andrews to retire. It is considered that any expansion of the town should be driven by economic and employment requirements. St Andrews will cease to be a World Class Destination if it becomes one big conurbation with its historic town centre in a permanent state of traffic gridlock.

Response:

The housing requirements include meeting the needs of those working in the town at present who cannot, for whatever reason, live there. It is considered that St Andrews has the potential to contribute to the generation of new employment opportunities. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

It appears that not a lot of thought has been given to the ability of the existing infrastructure of the town to cope with the proposed expansion and Fife Council has given no indication that it intends improving services which are currently under severe strain. Two main areas of concern are of the condition and size of Madras College and the traffic in the town centre which is already at saturation point.

Response:

The specific allocation of land for future development is a function for the Local Plan process. Full account has been taken of the important requirements and this will be addressed in detail via Local Plan, masterplans and development briefs.

Action:

Docherty, PR - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The proposed increase in size of St Andrews this beggars belief. The town centre has not changed over many years and will not be able to cope with any additional traffic.

Response:

Concerns noted. The traffic issues will be addressed via the Development Plan in conjunction with the Local Transport Strategy and Area Transport Plan. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

It is considered that the hospital site at Largo Road will result in a number of problems including increased traffic. Would have been obvious to site the new hospital at St Leonards Fields.

Response:

The need for a new hospital was addressed in the Fife Structure Plan (Approved 2002). The site is not a strategic planning issue. The Structure Plan states that a site would be identified and progressed by the appropriate Local Plan. The site proposed in the Local Plan is the one preferred by NHS Fife.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

A Green Belt is essential for the future of St Andrews, however this is being constantly eroded.

Response:

Agree Green Belt is essential. The boundary of the St Andrews Green Belt is delineated for the first time in the Draft St Andrews and East Fife Local Plan. Local Plan policies specify limitations on development in the designated area.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

Bassaguard is in an ideal position for tradesmen to have premises, tucked away where it is. To sell this land off for housing seems yet another unwise decision.

Response:

This issue is not strategic and being site specific is more appropriately addressed by the St Andrews and East Fife Local Plan.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Built Environment

Comment:

The medieval town of St Andrews should be preserved for future generations to enjoy. However, sadly, planners do not seem to consider this.

Response:

Full account is taken of historic townscapes when considering development proposals. The Local Plan contains policies to protect and enhance Fife's built heritage. The Urban Design Guide provides advice on the Council's expectations of quality design within the context of the National Planning framework.

Action:

Barker, T C - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

It is unrealistic to expect considered contributions from members of the public who are not expert in planning procedures and language when confronted by six documents totalling 675 pages, all of which appear to be mutually dependant and to overlap. It would be more meaningful to invite comments first on the key framework document, Fife Structure Plan, then only on all of the other documents once this Structure Plan has been Finalised.

Response:

The Fife Matters Consultation covered a number of documents which were inter-related and could not be issued one at a time. It was also considered that the simultaneous publication of the Area Local Plan would be helpful. However, concerns about the value of material is noted and will be taken into account in planning future consultation exercises.

Action:

Review consultation process.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

It is considered that the notable omissions from the Plan include a) the importance of restoring a rail link Leuchars to St Andrews to alleviate road traffic congestion in St Andrews and promote tourism; b) a restatement of Fife Council's existing policy of resisting development of the natural coast line; c) a clear requirement to identify a site for a new school in the Tay Bridgehead area; d) a recognition of the most important and immediate planning danger of all i.e. the risk that over development of St Andrews will simply destroy its attractiveness as a place for people to live work, study, play and visit for holidays and recreation.

Response:

These issues have all been considered part of the Plan preparation exercise. Fife Council will further consider the feasibility of a St Andrews rail link through the review of the Local Transport Strategy. Coastal development policies are contained in the Local Plan. The details of infrastructure and facilities required with new development are set out in the Local Plan and development briefs.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The proposed allocations for housing for St Andrews for 2006-2026 are too high. As nothing much has happened since the Strategic Study of 1998 and the 2002 approved Structure Plan it is unclear why these numbers are being promoted. The infrastructure is already over-stretched and additional houses would impose additional strain. In addition houses in this number are not needed as the population of Scotland is falling and there are only 419 people on the council's waiting list with St Andrews as their first choice.

Response:

The justification for new development is contained in the Report of Survey. The 1998 Study was to inform the replacement for the 1994 Structure Plan, which was approved in 2002. Significant changes have since taken place, which require the provision of land for new development for the period 2006-2026.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

The Green Belt policy represents a weak formula simply reflecting Fife Council's existing countryside policy and not the Scottish Executive's Green Belt policy of their Circular of 1985.

Response:

The detailed Green Belt policy guidance is contained in the Draft St Andrews and East Fife Local Plan which complies with Government guidance. The Scottish Executive has issued a Scottish Planning Policy (SPP) note on Green Belts which updates Circular 24/1985. This has been taken into account in finalising both the Structure Plan and the Local Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The aim of 45% affordable housing is praiseworthy but difficult to make permanent. For example affordable homes bought in 2002 for £48,000 sell 3 years later for £120,000 and measures are needed to keep resale prices affordable. Other measures the Council should consider to alleviate the shortage of social housing should include; 1) Applying for Pressured Area Status enabling more Council homes to built. 2) adopting House Stake - a shared equity scheme being introduced by the Scottish Executive giving Housing Associations part of the equity in perpetuity. 3) using, in St Andrews, at least some of the Communities Scotland allocation of £1.3 billion for the whole of Scotland over the next three years. 4) discouraging second home ownership by abolishing the current discount on Council Tax and instead doubling Council Tax on second homes.

Response:

The percentage requirement for the St Andrews Housing Market Area has been revised in the light of PAN 74, the public consultation and the updated Housing Needs and Affordability Study. This is considered to be a more feasible figure. Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing. In addition, Fife Council is actively pursuing other measures including applying for Pressured Area Status for the St Andrews area and other parts of Fife, investigating the Homestake scheme and reducing the Council Tax discount on second homes. Fife Council and Communities Scotland are constantly reviewing land availability in the St Andrews area and funding has been provided to Kingdom Housing Association to identify future opportunities for housing. Reference to the range of additional measures that the Council is pursuing has been inserted into the supporting text.

Action:

Change percentage requirements in Finalised Plan Policy H4 (Draft Plan Policy H5). Insert text to outline additional measures being taken.

Hannah, Margaret - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

It is misleading to imply that the Vision reflects that set out in paragraph 1.2 is part of the Community Plan. Neither it is a vision dreamt up by the Planning Service which crucially suggests that Fife's population should grow by 20,000 up to 2026. This is despite the General Register Office of Scotland's estimate for Scotland that population will fall. There is nothing in this plan to describe where these people are expected to come from or what problems of relocation will follow unless Fife grows its own population. Within 20 years, it is quite possible for Fife's population to grow by 20% by having the most family friendly policies and child-centred environments anywhere in the world but this is not included in the Structure Plan.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Concerned about the social impact the incomers will have on indigenous population. It is considered that the circumstances of the incomers will set up resentment and social tension and therefore fail to create "strong attractive, vibrant thriving communities" as stated on paragraph 1.3. It is considered that it would be better to upskill the indigenous population to start up new businesses, take on the highly demanding (but highly paid) work that as implied is necessary to keep up with the changes in the global economy.

Response:

Concerns noted. Upskilling is part of the Fife Council approach to achieving the workforce Fife needs to meet the challenge of implementing the Finalised Structure Plan.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is considered that Fife Council should be working towards trying to enhance the quality of living in the cities with an attractive hinterland for recreation, food production and sustainable forms of waste disposal. It is considered that the Structure Plan for Fife is too small an entity for the type of change that is envisaged. It would be better to go the way of transport planning and think in terms of Regions.

Response:

Disagree. The Structure Plan has a vital role to play in promoting change over the period to 2026 and beyond.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Concern to what extent the suburbanisation of Fife will drain life from Scotland's cities. It is not clear what the effect of over allocating the housing requirement will be on Dundee and Edinburgh. Is it really Fife Council's aim to depopulate these cities and create sprawl across Fife and, if there was not Fife Council but rather City Regions to the north and south of Fife would there be the drive to locating houses and businesses within Fife?

Response:

It is unlikely that providing housing to meet projected demands, local needs and making provision for some of the needs of the Edinburgh and Lothians area will result in a reduction in the vitality and viability of cities such as Edinburgh and Dundee.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

With regard to paragraph 1.14, the term Medium Scale Growth applied to St Andrews raises a number of issues as it relies heavily on development of the University and the golf tourism sector. As there is a number of other businesses, many of which are unrelated to the golf or University, it is considered important to involve the wider business community in St Andrews in any planning of economic development in the town. The growth of indigenous businesses is something to be encouraged over high energy consuming tourism and travel heavy student / academic connections. This is particularly important as the infrastructure of St Andrews is creaking now. Gridlock regularly occurs in the town centre, there is no decent rail link and the secondary school is painfully overcrowded.

Response:

There are various forums which allow the business community in St Andrews to have an impact into the forward planning of the town. Fife Council supports growing local businesses by utilising both in-house staff and working with agencies. It is intended that the infrastructure needs will be met timeously. The work undertaken via the Schools Estate Strategy will address education provision. Detailed transportation issues will be addressed via the Local Transport Strategy and Area Transport Plan.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Paragraph 1.16 states that Fife's economy will be focussed on public transport interchanges in town centres well served by public transport. St Andrews does not fit this description.

Response:

Paragraph 1.16 refers to major growth areas, which are referred to as Strategic Development Areas (SDAs).

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Fife Council can resist the pressure referred to in paragraph 2.7 by only allowing Housing Associations to build houses and by using innovative ownership options that prevent affordable housing from being sold on the open market. The only growth in housing that St Andrews needs to meet is the pressure from local families to find homes near each other. There is support for the encouragement of community ties in the town. This is what gives St Andrews its character and durability over the long term. There should be a strong discouragement for second home ownership in the town. There are possible other options for housing that would better fit the criteria set out in the Structure Plan policy on sustainability in ref paragraph 4.24.

Response:

The approach suggested cannot be delivered via the planning process. Local authorities have no powers to prevent second home ownership.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The Policy Objectives listed on paragraph 3.32 do not accord with sustainability principles. Para 3.37 similarly fails to implement sustainability principles unless other and different house building techniques and design are used. It is possible to build very low impact housing if people are willing to give it a try. The earth ship at Craigencault Ecology Centre, Kinghorn, is just one example of how housing might look by 2026, which could appeal to first-time buyers and are low cost. These ideas are not contained within the Structure Plan.

Response:

Disagree. The Policy Objectives accord with Scottish Executive guidance in relation to providing land for housing and the achievement of balanced, mixed communities. The Structure Plan identifies the broad amount and location of new housing land, with detailed policy guidance contained within Area Local Plans and supplementary guidance. Draft Plan Policy ENV3: Design Quality encourages the application of innovative design solutions, supported by the Council's Urban Design Guide. It has been deleted from the Finalised Plan and will be incorporated in Core Local Plan Policies.

Action:

Delete Draft Plan Policy ENV3 and move to Area Local Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Re paragraph 3.25, it is not clear if this hierarchy of commercial development has been used in previous plans. If so, it hasn't worked and the town centres are still failing dismally. It is considered that local business rents are too high in St Andrews with the result that local family owned businesses are disappearing and being replaced by an influx of chain retailers and charity shops. It is considered that this does nothing to contribute positively to Fife's sense of place. It is also considered that there is a lack of reference to the changing face of retailing, much more of which is internet based and will become more so over time. The era of the masses driving to out of town retail parks is coming to an end, but the Structure Plan does not take this into account.

Response:

The retail hierarchy is set out in NPPG8. Business rates are not a strategic planning issue as they are set by the Scottish Parliament. Town centres are dynamic locations and the planning system cannot preserve a location at any point in time. The Finalised Structure Plan is supportive of development in the Town Centres, including St Andrews, as the location for new retail development. Underlying research, as set out in the Report of Survey has informed the Plan's policies. This includes the effects of online retailing. Paragraph now renumbered 3.34.

Action:

Draft Plan Policy ENV3 moved to Area Local Plans.

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Despite all the talk about the Plan being a Fife plan with specific Fife sensitive approaches, it reads like a Plan for no - where as - well. For development to be defined as per the Planning Act this somewhat limits the framing of the consultation. It is considered that development is about realising the potential of people and place, imagining life in 2026 and creating the enabling conditions for communities to survive in that future. It takes vision, verve, and some experimentation. This is a one club plan using housing allocations as the engine for development which may have worked in the 1950s and 1960s but does not fit the context of the 21st Century.

Response:

Disagree that it is a single document approach. There are a number of agencies involved and committed to taking forward and implementing the Plan. The Finalised Structure Plan is only one document. (See Structure Plan Context).

Action:

Lunan, Nick - Kingsbarns, St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

With regard to paragraph 1.17 there is no reference to a St Andrews to Leuchars rail link, which is considered to be vital, would encourage many people like me to use the rail instead of by car. The proposal to develop spare capacity of RAF Leuchars is noted and it is suggested that this should not concentrate solely on the executive jet market. If Leuchars air field is to be further developed for commercial use, then a domestic flight network should be developed to serve the general population.

Response:

Impossible to cover everything in this section. The Local Transport Strategy will provide further detail on public transport proposals in/for St Andrews. Future development of air services at Leuchars likely to depend on the capacity, if any, made available.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

There is concern regarding Draft Structure Plan Policy H5 particularly in conjunction with Policies E2, E21 and E23 of the Local Plan. It is considered the situation could arise for a developer who wishes to build 100 houses in St Andrews but arranges to build the required 45 affordable housing on the cheapest land available within the housing market area, possibly in or near a small rural community with relatively cheap land prices. That community might not have local need for 45 affordable houses therefore the practicability of this policy is questioned. However Draft Structure Plan Policy H4 in combination with either Policy E2C, E21A or E23F make this possible.

Response:

Fife Council's clear preference is for on-site provision and failing that on a site as close as possible to the original site. It is also important that need is met as close as possible to its origin. Such issues would be more appropriately addressed by the Development Control system at the time of any application.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

It is considered that the leisure economy based on golf and tourism has reached saturation point.

Response:

Disagree. In view of the expected growth in global tourism, there is scope to encourage visitors to a wide range of facilities throughout Fife.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Support the plans to build sufficient affordable houses to satisfy local need, but under one condition - that when sold, these houses remain affordable (possibly through subsidy) so as to satisfy future local need. Remain unconvinced that an affordable house can remain affordable to the second prospective owner.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

McCallum, D - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

It is considered that St Andrews cannot support any further development on its boundaries as it is a unique location which has to be well preserved. It is considered that many of the proposals would be detrimental to the town in terms of the environment and maintaining the unique character of the town. Major concern about the proposal to build 1800 new houses, which represents a huge increase in the size of the town, as there appears little justification for such a large number of houses as it is not clear how the number has been identified. In addition it is considered that St Andrews does not have the infrastructure to deal with such a population increase as the road system is inadequate flooding is a regular occurrence and there is inadequate, provision of social infrastructure such as schools and health services.

Response:

Disagree. Housing need figures calculated by Fife Council using Scottish Executive specified methods. The numbers have been subject to review and a finalised figure is included in the Finalised Plan . It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned. Finalised Plan Strategy is seeking to change the emphasis away from West Fife to Mid Fife and expanding West Fife as suggested would not achieve this objective. Roads issues will be partly addressed via Local Plan and partly via Local Transport Strategy and Area Transport Plans.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

The Draft Structure Plan does not set out Green Belt policies in line with the Scottish Executive's Green Belt policy which would ensure the immediate surrounding area is protected to ensure that St Andrews is not over developed.

Response:

The detailed Green Belt policy guidance is contained in the Draft St Andrews and East Fife Local Plan which complies with Government guidance. The Green Belt boundary has been delineated to ensure adequate land is available for development to meet the needs of the period to 2026.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

Retail development in St Andrews should be restricted to the town centre to maintain the unique character of the town.

Response:

Policies S1 - S3 actively promote town centre locations for new development and St Andrews is specifically mentioned in Policy S1. However, it is not possible to rigidly apply such a restriction in entirety and satisfy Scottish Executive guidance NPPGS/SPP8. Guidance does allow retail development in other appropriate locations.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Draft Structure Plan does not address the need to provide affordable housing in St Andrews.

Response:

The Structure Plan sets a broad strategic land use planning framework, whilst the St Andrews and East Fife Local Plan addresses settlement level issues. However the Structure Plan does identify the pressing need for affordable housing in the St Andrews Housing Market Area and this is reflected in the percentage requirement for this Housing Market Area.

Action:

Change percentage requirements in Finalised Plan Policy H4 (Draft Plan Policy H5).

Robertson, David - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Do not object to building of protected low cost housing to meet the needs of local people.

Response:

Comment noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Fife Council appears oblivious to the fact that there is a serious lack of employment in North East Fife. Local people are already forced to travel for employment. In addition much of the employment that is available locally fails to provide a decent living wage.

Response:

Fife Council aware of need to provide employment in North East Fife and the strategy of the Finalised Structure Plan seeks to address this problem.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

As one of the main land owners in the area, St Andrews University is failing to act with responsibility and is compounding the housing crisis and bringing more employees into the area without providing accommodation to cope with this. There is concern that plans ensure that the University will benefit from developers as a result of sale for land to them and the provision of infrastructure for further university building developments. However they are still doing nothing to solve the housing crisis which they have been partly responsible for in this area.

Response:

Noted. However, the Council cannot require a University to provide residences. This issue is more properly addressed by the St Andrews and East Fife Local Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Infrastructure

Comment:

There is no evidence in the Plan of infrastructure provision for the future. Logically infrastructure should come first then plans for housing.

Response:

Fife Council has been in dialogue with all the service providers prior to preparing the Finalised Plan. Information on infrastructure and service needs/provision are set out in the Action Plan.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

There is concern about the condition of the roads and the lack of proposals in the Plan for urgently needed and long promised bypasses for Cupar and St Andrews. There is concern that the existing road network would not be able to cope with the traffic generated by the additional development.

Response:

These are detailed issues to be addressed via the Local Transport Strategy and Area Transport Plan. However, traffic issues would be fully addressed for new areas via Area Local Plan, Master Plans and development briefs. Potential for relief/distributor roads at Cupar and St Andrews is reflected in the Finalised Structure Plan.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Public Transport

Comment:

The current high cost of public transport encourages people to use cars and no mention has been made of any plans to reduce these costs. Public transport must be accessible and affordable to all.

Response.

Concerns about cost of public transport noted but not a strategic planning issue and is a matter for the Local Transport Strategy. Fife Council has also pressed for rail improvements.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Secondary schools in this area are already overcrowded and have been for many years. Plans to deal with this problem must be addressed once and for all. In addition lack of capacity in primary schools in a number of areas in north east Fife should also be addressed.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

It is considered that the health care centre in St Andrews is already overcrowded and there is a requirement for increased facilities, it is considered the problem of overcrowding is compounded by the ever increasing number of students who are no longer cared for by University medical staff and who now attend the health centre. Thereby exacerbating existing problems. In addition the health care provision is also made worse by the high proportion of elderly people retiring to St Andrews. It is considered that these problems will be greatly magnified by any additional housing and it must be ensured that the provision of additional facilities is made in advance of any new development.

Response:

The provision of new plan/additional health care facilities is a matter for NHS Fife, which is aware of the proposals for growing Fife's population 2006-2026.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Although Fife Council has stated that 45% of the total proposed housing should be affordable there is no definition of what is considered affordable and to whom.

Response:

The percentage requirement for the St Andrews housing market areas has been revised in the light of PAN 74, the public consultation and the results of the updated Housing Needs and Affordability Study. Affordable housing is defined in the Glossary of the Finalised Structure Plan and this is the same as that used by the Scottish Executive. It is defined as "Housing of a reasonable quality that is affordable to people on modest incomes. In some cases the market can provide all or some of the affordable housing that is needed, but in other places it is necessary to make housing available at a cost below market value to meet an identified need. In terms of low cost housing for sale, which is but one means of delivering affordable housing, affordability will be determined by house prices and average household incomes which vary across Fife". The updated Housing Needs and Affordability Study has been used to determine target house prices. These are set out in the Implementation Guide on Affordable Housing.

Action:

Change percentage requirements in Finalised Plan Policy H4 (Draft Plan Policy H5).

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

We are told that the Scottish Executive states 25% of housing should be affordable. So what is the definite amount or is that still to be eroded by the developer as usual.

Response.

The percentage requirement for the St Andrews housing market area has been revised and set at 30% in the light of PAN 74 (which sets a benchmark of 25%), the public consultation; and the updated Housing Needs and Affordability Study.

Action:

Change percentage requirements in Finalised Plan Policy H4 (Draft Plan Policy H5).

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

There is no mention of special status for St Andrews and surrounding areas.

Response:

Fife Council is seeking Pressured Area Status for the St Andrews area. This is reflected in a slightly higher percentage requirement for the St Andrews housing market area than the Scottish Executive's 25% benchmark. Reference to this is made in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing. Reference to a range of additional measures that the Council is pursuing has been inserted into the supporting text. In a wider context, the Plan refers to St Andrews internationally important heritage.

Action:

Insert text to outline additional measures being taken.

Comment No: 12

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

There is no mention of developers setting aside a sum of money (per house) to add to Communities Scotland Gro grant to subsidise low cost housing.

Response:

This level of detail is inappropriate for the Structure Plan which is a strategic planning document. Where appropriate, developers will be required to contribute to meeting the needs for affordable housing - this is addressed by Finalised Plan Policy H4 (Draft Plan H5).

Action:

Finalised Plan Policy H4 was Draft Plan H5.

Comment No: 13

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

There is no guarantee that the genuinely local people will get priority for affordable housing.

Response:

This is not a land use planning issue. However, Fife Council's Housing Service has published an Implementation Guide on Affordable Housing, which sets out priority client groups. Households with local connections are given priority but not exclusively so. Some provision is made for incoming workers for example.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

With low cost housing for sale, allocations must be made fairly and long term occupancy conditions placed on them to keep them low cost.

Response:

Comments noted. Agree that retention is an important issue. It has and is being addressed by Fife Council in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing

Action:

No Change

Comment No: 15

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

What happened to the £12 million allocated to the Council for low cost housing in this area?

Response:

This is not a land use planning issue, however, the funding disbursed by Communities Scotland (CS) is paid to housing associations and in some cases to private developers and not to Fife Council, although the Council does have an influence on where it is allocated. This is done on the basis of identified need. Whilst the St Andrews housing market area (HMA) has, in relative terms the highest level of need in Fife there are other areas with significant need also. The Dunfermline HMA, for example, has the highest level of absolute need in Fife. Both Fife Council and CS are well aware of the identified shortage of affordable housing in the St Andrews area. Consequently several developments have been financed in the area in the last few years. Recent projects in the area amount to £5 million investment from CS. Fife Council and CS are constantly reviewing the land available in the St Andrews area and funding has been provided to Kingdom Housing Association to identify future opportunities for affordable housing.

Action:

Mitchell, Colin - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Support those involved in drafting these plans to formulate far reaching projections for twenty years and commend them for trying to encourage development in Fife. It is considered the regeneration of Dunfermline and Kirkcaldy town centres is a catalyst for increasing the demand for population growth in Central and West Fife. Mixed together with ferry links and an additional bridge across the Forth this would help these two areas to generate growth in service businesses. Regeneration of some of the housing areas such as Cowdenbeath and Kelty would attract commuters to buy in to quality living close to the motorway. However from a road traffic point of view it is important to have people living close to motorways, railway stations, ferries and bridges.

Response:

Support noted. The major growth areas are allocated to area within proximity to major road and rail routes.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

With regard to the East of Fife there is unquestioned demand for high value housing, but poor road infrastructure and poor centre of town development are major issues which need to be resolved before Fife Council can be sure of where new housing is required. It is suggested that the following are required to assist in development; a) a new hospital in St Andrews; b) a new school in the Tay Bridgehead area; and c) a multi-storey car park within St Andrews.

Response:

The need for housing is not driven by infrastructure and town centre issues. Proposals for the hospital are well advanced. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. The issue of car parking should be addressed via the Local Transport Strategy and Area Transport Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

It is considered that the views of the historic town of St Andrews are unique and should be preserved. The Green Belt should not be spoilt by a continuous perimeter of housing and Green Belt wedges should be retained.

Response:

The boundary of the Green Belt delineated in the draft Local Plan takes account of the landscape setting of the town.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

It is considered that the road passing Lumbo Farm should be subject of major widening and realignment as it is an important relief road between the A195 Craigtoun Road. Upgrade of this road would prevent heavy traffic passing through the centre of St Andrews past the Cathedral and other historic buildings.

Response:

These are detailed issues to be addressed via the Local Transport Strategy and Area Transport Plan.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is considered that many of the real priorities for long term planning have not been addressed. Many of the proposals are adopting a cart before a horse approach or a sticking plaster approach as a short term solution. Fife Council wishes to satisfy statisticians text book projections within a short term restricted budget.

Response:

The Finalised Structure Plan seeks to secure a planned, long- term approach to development to address the concerns mentioned. It also seeks to ensure that appropriate funding is identified and is available at the right time.

Action:

Stewart, John - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Whilst Fife Matters is a complex document containing much detail it is considered that it contains much that is good is and of great strategic future importance to the whole of Fife. There is particular welcome and support for growing Fife's economy and increasing its population, especially creating development of Mid Fife and regeneration of the coastal area from Rosyth to Levenmouth. This was once the main economic area of Fife. For the future of Fife to be successful there must be no depressed or disadvantaged areas in the Kingdom.

Response:

Support noted. Fife Council is seeking, via the Finalised Structure Plan and other initiatives, to address the problem of disadvantaged areas.

Action:

Price, MLC - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

There is no justification for increasing the housing estate in and around St Andrews, since the infrastructure is already over stretched and under funded. On the other hand other parts of Fife may well benefit form carefully considered expansion, especially West Fife, the expansion were linked to improved job creation.

Response:

Housing need figures calculated by Fife Council using Scottish Executive specified methods. It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned. The Finalised Plan Strategy is seeking to change the emphasis away from West Fife to Mid Fife and expanding West Fife as suggested would not achieve this objective.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

It is considered that the so-called public consultation period was too brief. This, linked to developer led planning has scarcely given the people of St Andrews time to assess the full impact of the proposals. Fife Council should be aware of the strength of feelings expressed by the public at various meetings and the extraordinary high level of opposition to Fife Council's plans.

Response:

The Finalised Structure Plan was in the pubic domain from late November 2004. The public consultation was in excess of statutory requirements and comments were accepted beyond the deadline.

Action:

Clements, Anna - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

The proposals to grow Fife's population by 20,000 to 2006 by a further 30,000 to 2046 are wildly optimistic when set in the context of the Government Actuaries Department population projections for the whole of Scotland show decrease in population up to and beyond 2026. Fife Council is planning for a 5.7% growth when the Government is predicting a 0.3% reduction. Obviously there are demographic changes that come into play, however this does not explain the huge discrepancy between the figures. In the case of the proposals for St Andrews it is considered that the population growth planned would increase it by over 16% which is greatly in excess of the 0.3% reduction.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

In context of St Andrews the Plan does not address and clarify a number of issues including the location of where new residents in St Andrews will work, where the children will be educated, where will the health care services be provided, will the sewage / drainage services be improved, and it is not clear where all these residents will shop. St Andrews town centre is considered to be inadequate due to lack of parking and congestion.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

With regard to the references to St Andrews as a World Class Destination should be made clear that it currently has this status because of the golf, the history of the town (including the University) and the landscape setting. It is considered that Fife Council cannot develop a World Class Destination unless of course it is thinking along the lines of Disneyland Golf.

Response:

The reference to World Class indicates an intention to seek to improve the town beyond its international status.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

St Andrews is a thriving community of people who live there, the tourist, the golfer and visitors to the University and it is about time Fife Council listened to these residents who objected to the draft proposals for expansion during the Strategic Study exercise in 1998.

Response:

Concerns noted, however, Fife Council must plan for the future and make an appropriate land provision for that future via the planning process. Failure to plan in a positive manner could have adverse results as the proposals would all be developer-led.

Action:

Illingworth, G - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is considered if more population in Fife is really necessary then an effort should be made to introduce employment opportunities initially and give work to those in Fife who are unemployed. It is considered that no new industry would mean less requirements for new houses.

Response:

Fife Council aware of need to provide employment in North East Fife and the strategy of the Finalised Structure Plan seeks to address this problem by providing additional employment land and other initiatives in conjunction with other agencies.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

There is concern that additional houses for St Andrews means more problems due to traffic. The park and ride facility should be enlarged and, in addition an adequate local bus services should be provided to encourage people to leave cars at home.

Response:

The roads issue will be partly addressed via the planning system and partly via the Local Transport Strategy and Area Transport Plan. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

If the University could be persuaded to build 1000 more new student resident places and encouragement given to moving most students out of the town centre by restricting houses in multiple occupation, this area would provide housing, possibly low cost housing, for local people.

Response:

Noted. This issue is more properly considered by the St Andrews and East Fife Local Plan, which includes policy guidance relating Houses in Multiple Occupation.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

The larger of the two Green Belt options is preferred.

Response:

The Green Belt boundary depicted on the St Andrews and East Fife Local Plan is that preferred as it provides for both development and conservation objectives.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

A new secondary school in North East Fife is urgently needed.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

Stewart, Mr D R & Dr J M - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

The assumption that the population of Fife will rise by 5% over a period of the plan is questioned. Given the current demographic situation this seems unlikely and a presumption of expansion should not form the basis of the Structure Plan.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Strongly object to the proposed significant expansion of St Andrews as the town centre is currently congested. There is very little infrastructure on the outskirts of the town therefore the proposed development on this scale would only add to the current pressures to destroy the special nature of the town centre. In addition there is concern that this proposal is led by a pressure from developers rather than reflecting a natural demand.

Response:

The roads issue will be partly addressed via the planning system and partly via the Local Transport Strategy and Area Transport Plan. The proposed scale of development is considered appropriate to meet the projected requirements for the period to 2026. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1.000-1.800 to 1.200 in Finalised Plan.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

It is agreed that there is a need for affordable housing provided that this is sustained within a system (Housing Association) which would maintain the affordability in perpetuity.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the Council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Concerned about the creeping loss of Green Belt areas around the town. The lack of information about the alterations to the Green Belt since 1998.

Response:

The Green Belt was not delineated prior to the publication of the draft St Andrews and East Fife Local Plan.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

It is considered that it is unreasonable to ask public to comment on such a large number of documents in a relatively short time interval.

Response:

The Draft Structure Plan was in the public domain from late November 2004 onwards. It was considered helpful to publish the Structure Plan and Local Plan at the same time. Comments noted and this matter will be addressed in future consultations.

Action:

Review consultation process.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Concerned about the way the meeting at St Andrews was conducted. In particular it is considered that the presentations did not give detailed information about specific proposals for the St Andrews area. In addition officials did not always address the questions asked from the floor. There are also concerns about the way the meeting was chaired. Towards the end of the meeting concerned that the meeting was closed when many in the hall were still seeking to ask questions or raise issues. It is considered that the timetable for the meeting was far too tight. It would have been better to have had displays available for a longer period of time before the meeting with officials in attendance to answer detailed questions as this would have allowed an open forum for questions.

Response:

The presentations could not, in the timescale, go into detail. The questions were answered honestly and directly. Those who did not have time to attend the meeting had the opportunity to raise questions with officials. Officials were available prior to and after the meeting to discuss proposals. Concerns are noted. The consultation process is under review to improve consultations in the future.

Action:

Review consultation process.

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Whilst it is reiterated that all comments were being recorded, officials failed to give reassurance that these would be taken into account and stressed the need for written comments. There is concern that the public should be asked to come to a meeting and then be given no guarantee that account would be given of the opinions expressed. Consider support from the floor. It is considered that the exercise was one of paying lip service to the process of consultation without actually wanting to listen to the strong views expressed.

Response:

Comments made at the public meeting were recorded and are similar to those submitted in writing and the responses are set out within this document. All comments are carefully considered, but will not always result in a change to the Plan.

Action:

Milne, Alec - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

No support for a significant increase in the number of new houses in the St Andrews area primarily because it is considered the town cannot cope efficiently with the existing population.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The desire for more affordable housing in the St Andrews areas is accepted. However it is considered that the efforts of Fife Council to date have not benefited local residents' wishing to stay and work in the St Andrews area. It is considered that new affordable housing has been filled from families from outside the area.

Response:

The allocation of affordable housing is not a land use planning matter. It is however addressed in the Implementation Guide on Affordable housing which sets out priority client groups. Priority is given to those with a local connection.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

It is not clear how new affordable housing can be retained as affordable housing. It would be preferable if Fife Council would consider building houses for rent and thus have more control over housing costs for less well off families.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews Area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing. The issue of Council housing is not land use planning related. Current Fife Council is not to build social rented housing due to right-to-buy legislation, but this may be revised due course. The Council is currently pursuing Pressured Area Status for those areas with the most acute shortage of affordable housing.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

It is considered Madras College is already overcrowded and, prior to new houses being considered, a new school requires to be built somewhere in the catchment area. Additional primary school provision is also required.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

Faster progress is required on the development of a new hospital on the site at Largo Road which is considered to be well suited for an expansion of local services. In addition it is considered that faster progress for an associated health centre is required as existing facilities are too small for the existing population.

Response:

The provision of new additional health care facilities is a matter for NHS Fife which is aware of the proposals for growing Fife's population 2006-2026.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

It is considered that the central St Andrews traffic situation is now chaotic and there is support for pedestrianisation work and the provision of significantly more parking.

Response:

Concern and support for pedestrianisation noted. Parking is an issue to be addressed via the Local Transport Strategy and Area Transport Plan.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Remain unconvinced of the need for a marketing organisation to be given control or influence on the development of St Andrews. The major appeal of the town is its architecture and beauty and these need to be enhanced and made visible. Pedestrianisation would help achieve this. Whilst the need for Fife Council to exploit the financial benefits of tourism is accepted, it is considered that cleaning up the existing centre, whilst retaining its unique character, is the best option. If revenue generating tourists come, appropriate retailers will be quick to follow without the need for a marketing organisation.

Response:

Concerns and suggestions noted.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Realises the need to secure funding for infrastructure such as schools, roads and hospitals from the revenue received from new development. Fife should evaluate other sources of funding even if this means delays infrastructure provision. New infrastructure should be provided well in advance of any significant new housing and, if they cannot be afforded now, then new housing should wait and money should be put aside more slowly.

Response:

The approach suggested would not allow the Plan to be implemented in the timescale 2006-2026. The exercise of identification of the areas proposed for development in the Finalised Structure Plan has indicated that many of these areas require investment in infrastructure and facilities. It is unlikely that other services other than those founded by developer contributions would allow the Plan to be implemented in the timescales proposed.

Action:

Cunninghan & Ms E Fryer, J - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is unclear what changes have taken place since the publication of the St Andrews Strategic Study. It is considered that it is profoundly unscientific to suggest that either the landscape or the capacity of the town to handle traffic has changed and the desirability of further 1800 houses is questioned.

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements. The proposed scale of development is considered appropriate to meet the projected requirements for the period to 2026. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. Housing need figures calculated by Fife Council using Scottish Executive's specified methods.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

The exact increase in population numbers 1800 new houses in St Andrews will bring about is unclear as the figures vary from document to document and it is not clear how these figures were derived. The demographic distribution of the increase in population numbers contemplated is crucial to strategic planning. In addition it is considered that there should be clear economic justification for the figures quoted in the Plan as there is no clarity in where people living in these houses will be employed.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is considered that 1800 houses over the next 20 years in St Andrews will put excessive burdens on the landscape educational facilities and transport infrastructure of the town. The plan should identify how it will address the provision of education, especially for secondary school children, and how Fife Council intends to address the existing traffic gridlock problems of the town.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. Housing need figures calculated by Fife Council using Scottish Executive's specified methods. The roads issue will be partly addressed via the planning system and partly via the Local Transport Strategy and Area Transport Plan.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Securing inclusive developments must be part of demographic planning. Plan contains no acknowledgement of the need to ensure that any affordable housing built as part of the 1800 new houses should remain so in perpetuity. For a healthier mix of population of the town, there has to be some way to ensure that young people and those who actually work in the town are able to afford to live in it.

Response:

Fully agreed that development must be inclusive, balanced and mixed. Agree also that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the Council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing. The allocation of affordable housing is not a land use planning matter. It is however addressed in the Implementation Guide on Affordable Housing which sets out priority client groups. Priority is given to those with a local connection, although not exclusively so.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Crucial to ensure the quality of life of residents in St Andrews as a number of houses and flats are currently occupied by non-council tax paying students. If the University is to continue expanding, it must provide an adequate provision of suitable accommodation. It is considered that the Plan should ensure the provision of additional University accommodation and guarantee that the 1800 new houses will not become student lets.

Response:

Fife Council cannot require the University to provide additional student accommodation but may be able to secure this by agreement. It is not possible to control who purchases houses except for those provided for the affordable sector.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

A vibrant economy which encourages controlled growth of the population would appear to be of benefit to everyone living in St Andrews. However the Plan appears to be enabling developers to build for growth of the population without any underlying economic need coming from the town. No clearly thought out scientific plans as to consequences this growth.

Response:

It is considered that St Andrews has the potential to play a role in encouraging new employment opportunities.

Action:

Poole, Julie - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

It is considered that student demand for property pushes house rentals beyond the reach of many young people from St Andrews. It is considered affordable housing for rent must be protected to avoid greedy resale all over Fife. In addition the prices for new affordable housing must be realistic and targeted towards locals. It is considered that Housing Co-operatives are likely to be the best solution to resolve the problems of affordable housing provision.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the Council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing. Presumably comment refers to low cost housing for sale, which is only one means of delivering affordable housing. Where this tenure is being considered, affordability will be determined by house prices and average household incomes which vary across Fife. The updated Housing Needs and Affordability Study will be used to determine target house prices. These will be set out in the Implementation Guide. Comment on Housing Co-operatives noted although this is not a land use planning issue.

Action:

Yarr, Roddy - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

It is considered highly unsatisfactory that Fife Council consulted on so many key issues at the one time. It is considered that this is almost an infringement of civil liberty because it did not allow people to have a reasonable time period to understand the issues and to respond to them.

Response:

The Consultative Draft Structure Plan was in the public domain from late November 2004 onwards. The consultation was in excess of statutory requirements and late submissions were accepted. It was also considered helpful to publish the Structure Plan and Local Plan at the same time. Comments noted. The consultation process is under review to improve consultations in the future.

Action:

Review consultation process.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Fife Council has recognised the need for affordable housing and new housing in general, however it is not clear if the housing need is developer led or led by planning need.

Response:

The justification for the housing land requirement is contained in the Report of Survey. The requirement for new houses primarily arises from growth in the number of households, driven by a gradual reduction in household size.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Support the need for affordable housing but only if it remains affordable in perpetuity. Fife Council has to take a lead on this and put in place the process to keep housing affordable.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Concerned about the Council's demarcation of the Green Belt and, whilst understanding and supporting expansion of the University, cannot support the wider designation of the Green Belt in other areas. It is not clear how St Andrews has gone from a position in 2002 when there was no need to extend into the Green Belt to the current proposals, unless this is to purely satisfy developer needs.

Response:

The Green Belt identified in the 2002 Structure Plan as shown on the Key Diagram is indicative. Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries.

Action:

Policy and text amended.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Fife Council has failed to accurately define what the term 'St Andrews World Class' means and how it will be delivered by the Structure Plan. It is considered that St Andrews is currently World Class and could be improved by Fife Council by: a) protecting the landscape setting and preserving the Green Belt allowing only expansion for the University purpose; b) pedestrianisation of the town centre; c) improving traffic and transport linking both in the town and the bus and rail network; d) link trains and buses at Leuchars interchange as the current situation is highly unsatisfactory.

Response:

St Andrews World Class is a partnership driven by Scottish Enterprise Fife and is supported by Fife Council and other local bodies. It is considered that there is always scope for improvement in any location. It is considered that the planned growth will secure the conservation and development objectives over a long term period. Proposals are set out for improving public transport.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Sustainability

Comment:

It is considered this document is less than helpful and it is further considered that it is not robust in the criteria used and the assessment aspects. It is suggested that it has a peer review and is updated to include the Government statement to ensure that Assessment is updated on a regular basis.

Response:

The Sustainability Appraisal undertaken on the Draft Plan followed best practice. An Appraisal and Assessment of the Finalised Plan has been undertaken in the spirit new legislative requirements on Strategic Environmental Assessment.

Action:

Nicoll, M D - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is not clear why additional housing is being allocated to St Andrews in view of the conclusions of the 1998 Strategic Study and the 2002 Structure Plan which indicated that no new housing was required until 2011.

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

It is not clear why the assumption has been made that in spite of the fact that, population of Scotland is declining, the Plan for Fife is to increase the population. It is not clear why the population of St Andrews should increase by 30% over the next 20 years because St Andrews has been identified as the economic driver for Fife through the golf industry and the University. It is considered that an increase in golf tourism does not need any increase in local housing of an executive type and there is concern that any new housing will be occupied by commuters, or by retired people. It is considered that the growth cannot be justified by an increase in University graduates over he Plan period.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Whilst there is a need for affordable housing (which is not clearly defined) it is suggested that they should be developed on housing sites already designated for building.

Response:

A broad definition of affordable housing is contained in the glossaries of both the Draft Structure Plan and Supplementary Guidance on affordable housing. This is quite consistent with the definition used by the Scottish Executive. The scale of the affordable housing shortage in Fife is such that is not practical. In any event it is not possible to amend planning permission retrospectively. Many sites already have planning permission.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is considered that any increase in the size of St Andrews will destroy the landscape setting, lead to traffic gridlock and result in further drainage problems in the North Haugh and Kinness Burn Areas. The result would be to detract from the very reason for St Andrews as an economic driver for Fife.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Any affordable housing needs to be managed so that it is truly affordable in perpetuity and is not able to be resold in the market at "unaffordable prices".

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

Oberlanders Architects, Lawson, David - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Note that future housing developments will be required to provide 45% of the total number of dwellings as affordable housing. Believe that the figures being quoted will be untenable, resulting in falling land prices and planning blight. This would be undesirable to both the Council, housing developers, land owners and local people.

Response:

The Finalised Structure Plan and Supplementary Guidance have been modified in the light of PAN 74, the updated Housing Needs and Affordability Study and the public consultation. Consequently, the percentage requirement for the St Andrews Housing Market Area has been revised to 30%.

Action:

Change percentage requirements in Finalised Plan Policy H4 (Draft Plan Policy H5).

Lightwood, Anne - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Having studied both Structure Plan and the St Andrews and East Fife Local Plan and found it difficult to find the exact boundaries of the Green Belt and how these are to be maintained in the face of continuing pressures from development. Reference to the Green Belt are vague and unspecific and there is no mention of how long such regulations last or how fixed these boundaries may be. Questions whether golf course development would come within Green Belt criteria.

Response:

The detailed boundary of the Green Belt is shown on the St Andrews & East Fife Draft Local Plan. It has been delineated to provide for development need and this boundary will be defendable in the long term. The Scottish Executive has issued a Scottish Planning Policy (SPP) note on Green Belts which updates Circular 24/1985. This has been taken into account in finalising both the Structure Plan and the St Andrews and East Fife Local Plan.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Preserving the situation and character of St Andrews would seem to be a priority if it is to continue as a World Class tourist destination and heritage site, as stated in both Plans. In view of the increasing pressures from housing and other development, it seems essential that a clear definition of the extent of the Green Belt and the restrictions on development within it, are set out and strictly adhered to.

Response:

The draft Local Plan sets out appropriate policies.

Action:

Barker, G H - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Refers to Draft Plan Schedule H3 and Policy H5. Identification of 1,800 new houses for St Andrews is unrealistic. The 2002 Structure Plan said no new housing would be needed in St Andrews until 2002. What has changed to justify this new policy reversal?

Response:

Housing need figures calculated by Fife Council using Scottish Executive specified methods. It is considered that there is for St Andrews to play a vital role in encouraging new employment opportunities.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town. Draft Plan Policy H5 is now Finalised Plan Policy H4.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Suggest introduction of double or triple council tax on second homes to free up affordable housing.

Response.

This is not a land use planning issue. However, Fife Council is progressing reduction in Council Tax discounts as a means of delivering more affordable housing. Reference to a range of additional measures that the Council is pursuing has been inserted into the supporting text.

Action:

Insert text to outline additional measures being taken.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Suggests that the University houses the majority of students in campus accommodation to increase the pool of affordable housing available to those who wish to make a living in St Andrews. Further suggests the removal of the current tax concessions for landlords of houses in multiple occupation, and the introduction of a proposed policy of restricting the total of HMOs in any one area.

Response:

Noted. These are not strategic land use planning issues and as such are more properly addressed by the St Andrews & East Fife Local Plan. Comments will be considered in that context. The Council cannot require a University to provide residences.

Action:

Stemple, David - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Objects to the allocation of 1,800 new homes in St Andrews. Queries the location of the proposed new development and the statistics to support this scale of development proposal. This new allocation does not accord with previous Fife Council policy, The 1998 Strategic Study which rejected major housing developments in St Andrews and the 2002 finalised Fife Structure Plan which identified no new housing in St Andrews until 2011.

Response:

Disagree. Housing need figures calculated by Fife Council using Scottish Executive specified methods. It is considered that there is for St Andrews to play a vital role in encouraging new employment opportunities. The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Further objects to housing allocation for St Andrews. Only reason for justification of such an expansion in St Andrews would be to house workers needed to service the economy, and considers that St Andrews has no need to import workers.

Response:

It is considered that St Andrews has the potential to play a vital role in encouraging new employment opportunities.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Objects to medium scale housing allocation for St Andrews. Previous development has failed to provide affordable housing and infrastructure and has damaged the historic value of the town. St Andrews cannot absorb this scale of further development, which would damage the town as a desirable tourist destination.

Response:

Previous development has been planned to ensure it did not damage the historic value of the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Objects to scale of housing allocation for St Andrews. Priority should be to quantify need for affordable housing within the town.

Response:

Partial support noted. Affordable housing issues are addressed in Policy H4 of the Finalised Structure Plan (Draft Plan Policy H4).

Action:

Herbert, M - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Objects to further large scale extensions to St Andrews. This would be detrimental to the character and setting of the town.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

St Andrews should be protected by a Green Belt which should be maintained in perpetuity.

Response:

It is not possible to maintain such a long term commitment.

Action:

Mullan, W N B - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Policy ENV1 is disappointingly weak. Had hoped for a stronger commitment to the protection of the town's setting, taking account of the Green Belt policies set out in the Scottish Office Green Belt Circular of 1985.

Response:

The detailed boundary of the Green Belt is shown on the St Andrews & East Fife Draft Local Plan. It has been delineated to provide for development need and this boundary will be defensible in the long term. The Scottish Executive has issued a Scottish Planning Policy (SPP) note on Green Belts which updates Circular 24/1985. This has been taken into account in finalising both the Structure Plan and the St Andrews and East Fife Local Plan.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Reference to Draft Plan Schedule H3. The case for growing Fife, and in particular St Andrews has not been made. The allocation for St Andrews cannot be described as medium growth. The scale of development proposed will add further pressure to the town centre which is small in relation to the overall size of the town.

Response:

Housing need figures calculated by Fife Council using Scottish Executive specified methods. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Lack of clarity and certainty about figures quoted for existing population of St Andrews and the number of students in the University. Concerned that important decisions about the future size and shape of St Andrews are being made without a firm factual base.

Response:

There were problems over the population figures for St Andrews. However, these have been resolved.

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Leisure Facilities

Comment:

Note that no mention is made anywhere of golf courses. Already too many have been permitted, which are seriously detrimental to the land due to inappropriate building in the countryside. Concerned that where golf courses become uneconomic this will add to pressure to turn the land over to housing development.

Response:

Policy guidance on golf courses will be contained in Local Plans.

Action:

Barrie, Carolyn - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Objects to scale of housing allocation for St Andrews. This contradicts the Council's 1998 Strategic Study which pointed out the dangers of further large scale development in St Andrews.

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Concern that the imbalance between the town and the University of St Andrews has begun to have a detrimental effect on the town's amenities. University expansion together with proposals for new house building will put further pressure on traffic flow, town centre congestion and local schools. Concern that the Structure Plan does not take into account the wishes of local residents.

Response:

Concerns noted. The land for the proposed new development has been delineated taking full account of the various service and infrastructure issues including school provision. The issue of traffic congestion will be fully addressed via the Local Transport Strategy and Area Transport Plan. Comments of local residents are an important input into the decision making process.

Action:

Cormack, Richard - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Questions scale of development proposed for St Andrews. Quotes from 1998 Strategic Study which states "St Andrews is at it's landscape capacity and no major expansion should take place". Asks what has changed in the interim to justify further expansion.

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Concerns over damage to the setting of St Andrews by the growth of golf interests and the University. Need for a full Green Belt to protect the natural coastline and the views both from and to the town. Traffic growth will further destroy the historic charm of St Andrews.

Response:

The boundary of the Green Belt is delineated in the draft Local Plan takes account of the landscape setting of the town.

Action:

Powell, Brian - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Objects to the medium scale housing allocation at St Andrews. Proposals would increase town centre congestion and add further pressure on local health care facilities.

Response:

It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Proposed location of houses on the southern edge of the town will create urban sprawl and ruin the town's character.

Response:

It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

Weir, Tim - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Plan is a developers wish list for St Andrews rather than giving proper and focussed consideration to how best to serve the genuine needs of the town. St Andrews would be degraded by the Plan and become less of an attraction.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. It is considered that St Andrews has the potential to play a vital role in encouraging new employment opportunities. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Roads

Comment:

The Plan increases the population and inevitably increases the traffic into St Andrews, exacerbating existing problems.

Response:

The population growth will be matched by the provision of infrastructure and traffic measures which will be defined partly by the planning process and partly by the Local Transport Strategy and Area Transport Plans.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Need for a Green Belt to preserve views into St Andrews to be established urgently to prevent encroaching development. Quotes from St Andrews Strategic Study 1998 "St Andrews is at it's landscape capacity and no major expansion should take place".

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan, which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Agrees that St Andrews requires more affordable housing, but 45% requirement is too high.

Response:

Support in principle noted. The percentage requirement for the St Andrews Housing Market Area has been revised in the light of PAN 74 and the updated Housing Needs and Affordability Study. The new figure of 30% will be used in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

Change percentage requirements in Finalised Plan Policy H4 (Draft Plan Policy H5) (and Policy AH1 of the Supplementary Guidance).

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Need for a new secondary school in North Fife to relieve the pressure on St Andrews schools and the town centre.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Concerned that affordable housing would only remain affordable to the first buyer and not in perpetuity.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Suggests that new housing development should be for affordable housing only with a mix of properties for rent and for sale, which should be permanently affordable.

Response:

In line with Scottish Executive and Fife Council policy, the Structure Plan seeks to achieve mixed and balanced communities with a range of house types and tenures. Affordable housing should be well integrated with mainstream housing. Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

Byrne, Richard W - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Green Belt Policy does not reflect the Scottish Executive's Green Belt Circular of 1985.

Response:

The detailed Green Belt policy guidance is contained in the Draft Area Local Plan which complies with Government guidance.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Questions the scale of development proposed for St Andrews. New growth proposed is not medium scale in relation to the size of St Andrews.

Response:

It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Policy H5 - Affordable Housing. It is unclear if the requirement for 45% of affordable housing on sites in St Andrews would be adhered to.

Response:

The percentage requirement for the St Andrews housing market area has been revised in the light of PAN 74, the public consultation and the updated Housing Needs and Affordability Study. The percentage requirement contained in the Structure Plan and Supplementary Guidance on affordable housing will be a requirement which proposals must adhere to unless there are clearly demonstrated exceptional circumstances. It will also be a material consideration in determining planning applications.

Action:

Change percentage requirements in Finalised Plan Policy H4 (Draft Plan Policy H5).

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Actual population of St Andrews seems to be uncertain. Does it include the student population?

Response:

The GRO population estimate for St Andrews at 2003 is 14,420. This includes students although there may be an undercount of some 500 students which have been assigned to Strathkinness.

Action:

Robertson, Alicia - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Concern at the proposed development of the St Andrews area and whether the wishes of the people of St Andrews would be considered.

Response:

The views of everyone who has responded have been fully considered.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Concerned about the scale of growth for St Andrews, considering that a nil shortfall of housing until 2011 was identified in the adopted Structure Plan 2002.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Acknowledges that there is a need for affordable housing in St Andrews, but concerned that at present these houses are only affordable to the first purchaser. Need for Fife Council to have powers to control the sale of future affordable housing.

Response:

Support in principle noted. Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Concerned at the lack of a definitive figure for the current population of St Andrews and how this relates to the student population.

Response:

There were problems over the population figures for St Andrews. However, these have been resolved.

Action:

Young, Jean - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Green Belt policy does not reflect advice of Scottish Executive Advice of 1985.

Response:

The detailed Green Belt Policy guidance is contained in the Draft St Andrews and East Fife Local Plan, which complies with Government guidance. Local Plan clearly shows boundaries. Contours often omitted to avoid clutter. The Scottish Executive has issued a Scottish Planning Policy (SPP) note on Green Belts which updates Circular 24/1985. This has been taken into account in finalising both the Structure Plan and the Local Plan.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

The scale of growth proposed for St Andrews is not medium-scale.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Town centre is often congested and any increase in the size of the town will generate even more traffic despite Fife Council's plans for the future.

Response:

These are detailed issues to be addressed via the Local Transport Strategy and Area Transport Plan. However, traffic issues would be fully addressed for new areas via Area Local Plan, Master Plans and development briefs.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Reinstatement for the rail link to St Andrews has become an essential to help reduce existing traffic problems should be given priority.

Response:

Proposal PT1 of the Finalised Structure Plan (PT2 of the Draft Plan) refers to options to connect St Andrews to the rail network.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Much of the St Andrews housing stock is rented, not owner occupied. It is anticipated that new housing stock will suffer the same fate.

Response:

Noted. This is not a Structure Plan issue and is more properly considered by the St Andrews and East Fife Local Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Sustainability

Comment:

It is estimated that over 50% of the town centre is rented accommodation, which has resulted in a loss of community feel for many areas. It is considered that the new development will exacerbate this unity.

Response:

This is an issue for the Area Local Plan.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Some additional affordable housing stock is required in St Andrews but requirement is generated by the significant number of properties in the hands of developers and investors.

Response:

This is not a strategic planning issue and is more appropriately addressed by the St Andrews and East Fife Local Plan. Comment will be considered in that context.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Houses in Multiple Occupancy

Comment:

Methods of controlling the spread of HMOs in St Andrews need be investigated urgently.

Response:

Noted. It is acknowledged that this is an important local issue. However as the Structure Plan is a strategic document, this matter is more appropriately addressed by the Local Plan process, especially the St Andrews and East Fife Local Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Any new affordable housing should remain so in perpetuity.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

Byrne, Jennifer - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Green Belt policy does not reflect advice in Scottish Executive Evaluation of 1983.

Response:

The detailed Green Belt policy guidance is contained in the Draft Area Local Plan, which complies with Government guidance. The Scottish Executive has recently issued a Scottish Planning Policy (SPP) note on Green Belts which updates Circular 24/1985. This is being taken into account in finalising both the Structure Plan and the St Andrews and East Fife Local Plan.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The scale of growth proposed for St Andrews is not medium-scale.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

It is unclear if affordable housing provision of 45% (for the St Andrews housing market area) will be adhered to or not.

Response:

The percentage requirement for the St Andrews housing market area has been revised in the light of PAN 74, the public consultation and the updated Housing Needs and Affordability Study. The percentage requirement contained in the Structure Plan and Supplementary Guidance on Affordable Housing is a requirement which proposals must adhere to unless there are clearly demonstrated exceptional circumstances. It will also be a material consideration in determining planning applications.

Action:

Change percentage requirements in Finalised Plan Policy H4 (Draft Plan Policy H5).

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Actual population of St Andrews seems to be uncertain, does it include the student population?

Response:

The uncertainty over the population of St Andrews has been resolved and is explained within the Finalised Report of Survey. The student population is included within the population figure for the town.

Action:

Montford, GT-St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The basic Plan principles which may apply to Mid Fife are not acceptable as a basis for defining the future of East Fife and St Andrews.

Response:

The principles as adopted by Fife Council are appropriate to St Andrews and East Fife.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

St Andrews is unique in Scotland and further large scale economic development and house building will destroy the town.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

St Andrews has no need of further development as it has two major engines for its economy, golf tourism and the University. The main thrust of economic development should be to spread the benefits of these engines more widely throughout East and Mid Fife and not to expand St Andrews in this immediate environment.

Response:

Noted. It is intended that the benefits derived from golf tourism and University derived employment will be spread wider than St Andrews but there is scope for the town to accommodate growth in these sectors.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Tourism

Comment:

The current levels of visitors to St Andrews can be accommodated without too much friction except in peak periods when the transport infrastructure is under great strain.

Response:

Noted. Transport issues are being addressed via the Local Transport Strategy and Area Transport Plan.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

The balance of the St Andrews shopping centre is increasingly distorted in favour of tourists rather than shops required to support the residents.

Response:

The planning system can only exert limited control over types of retailing especially if change of use falls within the same Use Class Order. The importance of St Andrews town centre's role in serving local needs is however, acknowledged.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Tourism

Comment:

Alternative attractions are needed outside St Andrews to draw visitors away from the town centre and mechanisms are required to spread the benefit of golf tourism throughout Fife.

Response:

There are a wide range of attractions for visitors in and around Fife. The Finalised Structure Plan aims to spread the benefits of tourism throughout Fife.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

University of St Andrews brings many major cultural and economic benefits to the town and East Fife, however, any further development will be at the expense of the town and residents because of the knock on effects of providing student housing, student car parking and other student associated facilities.

Response:

The further development emerged for the University is not a growth in students numbers rather in employment opportunities generated via research and development and the knowledge economy. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Opposed to further development in St Andrews town centre because the town, in its present state, is incapable of accommodating any further expansion.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Expansion of other economic engines for St Andrews will undermine the overall strategy of Fife Council. This will require to be supported by massive numbers of new houses, resulting in suburban sprawl. If no new houses are built, workers will have to commute into the town from elsewhere. Both scenarios would cause resultant congestion within the town centre.

Response:

It is considered that the growth of St Andrews as planned can be achieve without resultant sprawl. It is agreed that if no new houses are built the commuting into the town would increase. Town Centre congestion is an issue being addressed via Area Transport Strategy and Area Transport Plans.

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is considered that if the University of St Andrews wish to expand high technology based industry in association with other science departments and this can be achieved in areas such as Mid Fife as there is no need for this development to be in the immediate vicinity of the town. Remote developments could be facilitated by use of modern communications technology.

Response:

Whilst it is agreed that downstream employment can be generated/developed remote from the University it is considered that much of the research and development work is best located in close proximity to the University.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Population estimate for Fife appears to be very over optimistic when viewed against a falling population for Scotland and the relatively marginal position of Fife within UK and Europe. It is difficult to see where the extra people are coming from and why they should come to Fife.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Comment No: 12

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Fife is in competition for inward investment with other areas of Scotland, the UK and Europe. People tend to follow work rather than work following people and providing housing in areas where there is no increase in employment will merely result in increasing the numbers of those commuting.

Response:

Aware of the competition, however Fife Council is prepared to meet the challenge it has set. Fife Council and other agencies are working towards improving Fife's economy and increasing the job opportunities. Finalised Structure Plan is one of a set of documents seeking to facilitate positive change.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

It appears there is developer pressure to build more houses in St Andrews and its surroundings using the argument that demand is there. Because this may be true, it is no reason in itself for agreeing to developer demands, and examples of controls elsewhere e.g. Channel Islands and the Lake District, should be adopted to give priority to local residents and their families and protect what they have.

Response:

Comment noted. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 14

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Houses in Multiple Occupancy

Comment:

The unrestricted development of houses in multiple occupation in the town aimed at the student market is unwelcome. The University of St Andrews must take responsibility and provide accommodation for the bulk of its students.

Response:

Noted. It is acknowledged that this is an important local issue. However as the Structure Plan is a strategic document, this matter is more appropriately addressed by the Local Plan process, especially the St Andrews and East Fife Local Plan. The University cannot be required to provide student accommodation. The Council is, however, liaising with the University.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Infrastructure

Comment:

Neither the infrastructure of St Andrews nor the surrounding countryside can take a further large influx of residents.

Response:

Fife Council has been in dialogue with all the service providers prior to preparing the Finalised Structure Plan. Information on infrastructure and service needs/provision are set out in the Structure Plan Action Plan. Fife Council with partners continue to further training and education opportunities. The Fife Economic Development Strategy "Growing Fife's Future" sets out a number of actions in this regard.

Action:

No Change

Comment No: 16

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Mechanisms must be found to ensure that affordable housing remains affordable and is not sold on at market value.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Fife Council has a duty to implement the Green Belt as agreed by the Scottish Executive. It is considered that Fife Council must resist any further attempts by the University of St Andrews and developers to destroy it.

Response:

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which also identify the boundaries.

Action:

Policy and text amended.

Comment No: 18

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

The provision of improved transport across the whole of the East Area of Fife is supported. The key to achieving this is the provision of a light railway from Leuchars to St Andrews. In addition, measures should be introduced to address the parking problems within the centre of St Andrews. Further, a cleaner environment could be achieved by pedestrianisation of the town centre.

Response:

Support noted. See Finalised Plan Proposal PT1 (Draft Plan Proposal PT2) for reference to rail link. Detailed parking issues will be addressed via Local Transport Strategy and Area Transport Plans.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

A new school in the Tay Bridgehead area would greatly reduce the need for bussing pupils and would allow further pedestrianisation of St Andrews town centre.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

Chapman, V K - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Support for St Andrews Community Council and their objections to the Structure Plan. Concern that further development will exacerbate existing traffic problems.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Support for Green Belt particularly on the southern hillside.

Response:

Support noted.

Action:

Pollmann, Karla - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Object to further growth at St Andrews and support establishment of a Green Belt around the town.

Response:

The boundary of the St Andrews Green Belt is delineated for the first time in the draft St Andrews and East Fife Local Plan. The Green Belt is designated to provide for necessary development and secure other policy objectives.

Action:

Wishart, Brian J - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Objection to the further expansion of St Andrews. Particular concern over the impact of further growth on the town centre.

Response:

The town centre issue will be addressed and any appropriate actions later in the consultation with interested parties. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Object to the plan's focus on Central Fife.

Response:

Objection noted.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

Concerned that retail premises requirements in St Andrews are already strained by Council Tax.

Response:

This is not a strategic land use planning issue. Business rates are set by the Scottish Executive.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

Argues that the basis of local household taxation may well change in the future which would undermine current calculations within the Structure Plan.

Response:

It is not practicable to plan ahead on the basis of possible changes to the taxation system which may or may not happen.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Housing growth in Dalgety Bay has been due to the proximity of large number of employment prospects in Edinburgh. There is no equivalent employment base to support development in North East Fife.

Response:

Agreed that much of the population growth in Dalgety Bay has been attributable to commuting. Fife Council in conjunction with other agencies is seeking to capitalise on the strengths of the area to generate employment and the Finalised Structure Plan has a role to play in making the strategic land use allocations.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Object to lack of consideration of current traffic levels in, to and from St Andrews.

Response:

Transportation has been considered in allocating strategic new housing. A new link road is proposed with the new housing.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Queries Fife's strategy for population growth when Scotland's population is apparently falling.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Climate Change

Comment:

Encouraging use of motor cars will accelerate climate change.

Response:

Strategy does not advocate increased levels of car usage. There is strong support in the Finalised Structure Plan for increased use of public transport to service new development, and locational guidance to minimise travel, especially by car.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Should take the opportunity to focus on the development on areas such as Glenrothes rather than developing St Andrews.

Response:

New housing is provided within each of the four Housing Market Areas across Fife as detailed in the Report of Survey.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Kay, Martin - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

No additional houses should be constructed in the St Andrews area till one or more additional secondary schools are provided.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

It is considered that the lack of affordable housing is caused by demand for student accommodation. It is considered that this could be mitigated by the University of St Andrews building more accommodation of its own. The release of student accommodation would have beneficial knock on effects in achieving a balanced, cohesive society.

Response:

The Council cannot require a University to provide residences. This is not a strategic planning issue and is more properly addressed by the St Andrews and East Fife Local Plan. Comment will be considered in that context.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

With contribution to the well being of St Andrews derived from the University, golf and tourism is recognised. However, there is no wish to see any of these grow in a disproportionate manner which is incompatible with the existing character of the town. Anyone with experience of seeing a location transformed into a "World Class Destination" will be aware and fearful of the devastating change that is involved.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. It is considered that the planned growth and improvements to achieve the world class destination can be achieved in a planned way that takes full account of St Andrews' merits.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

A range of measures are required to address traffic congestion in St Andrews i.e. better public transport in particular a rail link. Plus a bypass could protect a vulnerable town centre like St Andrews. It is not a fully sustainable solution.

Response:

Whilst it would contribute, it is not considered that a rail link would cause a very significant reduction in traffic congestion in St Andrews. Based on survey results, only about 7% of the traffic in St Andrews is through traffic.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

It is considered that the integrity of the Green Belt is diminished by each, apparently, insignificant incursion. It is considered that Green Belts should remain in violet for this reason and no efforts to redefine them should be made.

Response:

The boundary of the St Andrews Green Belt is delineated for the first time in the draft St Andrews and East Fife Local Plan. The Green Belt is designated to provide for necessary development and secure other policy objectives. It is not possible to define such long-term boundaries.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Houses in Multiple Occupancy

Comment:

Concerned about number of houses in multiple occupancy in central St Andrews.

Response:

Noted. It is acknowledged that this is an important local issue. However as the Structure Plan is a strategic document, this matter is more appropriately addressed by the Local Plan process, especially the St Andrews and East Fife Local Plan.

Action:

Wilson, Douglas - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Objects to the number of documents out for public consultation within the eight week period.

Response:

The Consultative Draft Structure Plan was in the public domain from late November 2004 onwards. Comments noted. The consultation was in excess of statutory requirements and late submissions were accepted. The consultation process is under review to improve consultations in the future.

Action:

Review consultation process.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

Concern over economic assumptions underpinning the Plan. Fife Council's aspirations for population growth in the face of a decreasing Scottish population are overly optimistic. There is uncertainty that business will locate to Fife given business start-up being below the national average. Fife Council over emphasises St Andrews as the economic driver for Fife which may seriously damage the integrity of the town.

Response:

Concerns about economic assumptions and population growth noted. Business relocation and start-up rates are two separate issues. The first is addressed by providing suitable conditions for businesses to have the confidence to move to Fife which is exhibited to the National Planning Framework. The second requires Fife Council and other agencies being supportive to those people looking to start up new businesses. St Andrews has been identified in the National Planning Framework as an economic driver and it is intended that any new development will be planned in such a way so as to prevent damage to the town and its surroundings.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

The infrastructure of St Andrews cannot support the scale of growth proposed. St Andrews Strategic Study stated "St Andrews is at its landscape capacity and no major expansion should take place, this would result in an unacceptable impact on the quality of the town environment."

Response:

It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned. Full account has been taken of landscape issues in delineating the Green Belt boundary in the Area Local Plan.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Finalised Fife Structure Plan 2002 identifies no need for new housing in St Andrews until after 2011. Questions the scale of proposed growth given that little has changed since these studies and questions the proposed completion rates which would be more than double the current build rate. Where is the need or demand for this expansion given that St Andrews University will not dramatically increase the number of students and RAF Leuchars is also not likely to expand in the future? 1800 new homes will have negative impact on traffic, schools, health facilities and infrastructure.

Response:

It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Fife Council should build council houses on the land it owns to meet affordable housing needs.

Response:

Current Fife Council Policy is not to build Council housing due to the financial implication of right-to-buy legislation, but this may be reviewed in due course. However, the Council is using some of its surplus land to facilitate the provision of affordable housing.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Fife Local Plan fails to deliver the Green Belt mandated by the Scottish Executive and in the 2002 Structure Plan. The proposed boundaries are unacceptable and do not provide a full Green Belt encircling the town and preserving its landscape setting. Objects to Green Belt allowing extensive land for building in areas that would ruin the landscape setting of St Andrews.

Response:

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries.

Action:

Policy and text amended.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Climate Change

Comment:

Turning St Andrews into a commuter town for Dundee and Edinburgh is in contravention of Fife Council's environmental policy to reduce carbon emissions in line with the Kyoto accord.

Response:

Strategy does not advocate increased levels of use of cars. Plan promotes medium and strategic scale development in areas which have good public transport links. There is strong support in the Finalised Structure Plan for increased use of public transport to service new development, and locational guidance to minimise travel especially by car.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Fife Council should make a case to Communities Scotland that due to the economic importance of St Andrews it should be given a larger slice of the £1.3 billion pounds recently allocated by the Scottish Executive over the next three years to provide affordable housing. Apparently none of this money will be spent in St Andrews. Why is this the case?

Response:

Both Fife Council and Communities Scotland are aware of the identified shortage of housing in the St Andrews area. Consequently several developments have been financed in the area in the last few years. Recent projects in the St Andrews area amount to £5 million investment from Communities Scotland. Fife Council and Communities Scotland are consistently reviewing land availability in the St Andrews area and funding has been provided to Kingdom Housing Association to identify future opportunities for housing.

Action:

Fraser, P J - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Consultation on so many documents at one time is confusing. Public meetings have not provided answers to the question posed and were a waste of time.

Response:

The Consultative Draft Structure Plan was in the public domain from late November 2004 onwards. Comments are noted. The consultation process is under review to improve consultations in the future. The formal sections of the meetings were not intended to be exhaustive question and answer sessions. It was intended that the informal session would allow members of the public to discuss the plans with members of staff and have their questions answered. All the comments made are carefully considered, but will not always result a change to the plan.

Action:

Review consultation process.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Fife Council is back-tracking from its 1998 Strategic Study which said that St Andrews was at its landscape capacity and that no major expansion should take place. Fife Council is ignoring the Scottish Executive's Green Belt policy. Objects to the development proposals within the Local Plan which would invalidate the proposed Green Belt.

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements. The detailed Green Belt policy guidance is contained in the Draft St Andrews and East Fife Local Plan which complies with Government guidance.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Queries the scale of proposed development for St Andrews and how the figures have been decided. Queries the change from a zero housing land requirement in the period up to 2011 in the Fife Structure Plan 2002 being changed to 500 houses in the current draft Structure Plan.

Response:

Housing need figures calculated by Fife Council using Scottish Executive's specified methods which is common methodology throughout Scotland. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Design Quality

Comment:

Concern that new build development is in a standard style. Planning department should require some variation which is typical of the local town.

Response:

Concern noted. Design Quality Policy ENV3 seeks to achieve new development which takes full account of the surrounding area. Draft Plan Policy ENV3 will be included in Area Local Plans.

Action:

Draft Plan Policy ENV3 will be included in Area Local Plans.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Supports provision of affordable housing provided that it is perpetually in the public domain. Concern that existing so-called affordable housing developments are sold on at profit within a very short space of time.

Response:

Agreement in principle noted. Agree also that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Does affordable housing have to be linked to new executive housing? How can Fife Council house people on its waiting list if Council houses are being sold off below building costs?

Response:

The scale of the affordable housing shortage in Fife is such that Communities Scotland funding is unable to address it in entirety. In such situations, the planning system can make a legitimate contribution through the delivery of mainstream housing, which will take the form of a mixture of house types. The aim should be to achieve a mixed and balanced development with a range of house types. Fife Council has applied for Pressured Area Status (suspension of right-to-buy) for the areas of greatest need in Fife.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Coast

Comment:

What are the plans for the coast line which have been omitted from this plan?

Response:

Policies dealing with the coast are now Core Local Plan Policies and will be contained in emerging Area Local Plans.

Action:

Edwards, A S - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

There is no definition of "St Andrews World Class".

Response:

The expression is used to indicate that St Andrews is a World Class Tourist destination and should be recognised as such for the role it can play as an economic driver.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

The scale of growth for St Andrews considering that a nil shortfall of housing until 2011, was identified in the approved Structure Plan 2002.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. Housing need figures calculated by Fife Council using Scottish Executive's specified methods. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Policy H5. Affordable housing, which is not defined, should be maintained as affordable in perpetuity. Whilst the Plan's requirement for affordable housing in St Andrews is 45%, it is not clear if the number will be decided by the developers or in compliance to the Scottish Executive's PAN 74 (25%).

Response:

A broad definition of affordable housing is contained in the glossaries of both the Draft Structure Plan and Supplementary Guidance on affordable housing. This is quite consistent with the definition used by the Scottish Executive. In terms of low cost housing for sale, this will be set out in the Implementation Guide for affordable housing being based on the Updated Housing Needs and Affordability Study. Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing. The percentage requirement for the St Andrews housing market area has been revised as a result of PAN 74, the results of the above study and of the public consultation. The justification and reasoning behind this calculation is set out in the Finalised Report of Survey and Supplementary Guidance on Affordable Housing.

Action:

Change percentage requirements in Finalised Plan Policy H4 (Draft Plan Policy H5).

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Objects to the proposed Green Belt boundary which ignore at the landscape assessment study of 2003.

Response:

The landscape issues have been fully considered as part of the process of delineating the St Andrews Green Belt boundary.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Objects to the proposed Green Belt boundary, which ignores the Landscape assessment Area Study of 2003 and proposed boundaries for the Green Belt do not meet the mandate set down within the 2002 Structure Plan.

Response:

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries.

Action:

Policy and text amended.

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Welcomes the identification of cycle lanes and speed limits near schools. Suggested plans for traffic flow and parking in St Andrews are inadequate. A park and ride system is needed in conjunction with peripheral parking. Pedestrianisation of the town centre should be considered.

Response:

Welcome noted. Detailed traffic management issues are addressed via Local Transport Strategy and Area Transport Plan. Support for pedestrianisation of town centre noted.

Action:

No Change

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

The development plan focuses on St Andrews as an economic driver for Fife. Major housing development will destroy the very qualities which make the town so attractive.

Response:

St Andrews has been identified as an economic driver and it is intended that any new development will be planned in such a way so as to prevent damage to the town and its surroundings.

Action:

Thorsen, Susanne - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Local plan fails to deliver the Green Belt mandated by the Scottish Executive and in the 2002 structure plan. The proposed boundaries are unacceptable in the extensive land for building in areas that would ruin the landscape setting of St Andrews.

Response:

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries.

Action:

Policy and text amended.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Development on scale proposed would irretrievably damage the landscape setting and medieval heritage of the town of St Andrews.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Objects to the scale of development proposed for St Andrews up to 2026. Where are the statistics to support this development proposal? Objects to the allocation of 1,800 new homes in St Andrews. Queries the location of the proposed new development and the statistics to support this scale of development proposal. This new allocation does not accord with previous Fife Council policy, the 1998 Strategic Study which rejected major housing developments in St Andrews and the 2002 finalised Fife structure plan which identified no new housing in St Andrews until 2011.

Response:

Housing need figures calculated by Fife Council using Scottish Executive's specified methods. The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Objects to scale of housing allocation for St Andrews.

Response:

Objection noted. Response given to previous comments.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Objects to the number of documents out for public consultation within this eight week period.

Response:

The Consultative Draft Structure Plan was in the public domain from late November 2004 onwards. Comments are noted. The consultation was in excess of statutory requirements and late submissions were accepted. The consultation process is under review to improve consultations in the future.

Action:

Review consultation process.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

Concern over economic assumptions underpinning the Plan. Fife Council's aspirations for population growth in the face of a decreasing Scottish population are overly optimistic. There is uncertainty that business will locate to Fife given business start-up being below the national average. Fife Council over emphasises St Andrews as the economic driver for Fife which may seriously damage the integrity of the town.

Response:

Concerns about economic assumptions and population growth noted. Business relocation and start-up rates are two separate issues. The first is addressed by providing suitable conditions for businesses to have the confidence to move to Fife which is exhibited in the National Planning Framework. The second requires Fife Council and other agencies being supportive to those people looking to start up new businesses. St Andrews has been identified in the National Planning Framework as an economic driver and it is intended that any new development will be planned in such a way so as to prevent damage to the town and its surroundings.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

The full scale development for St Andrews will make it the fastest growing town in Fife, its infrastructure cannot support growth of such dimensions.

Response:

Full account has been taken of the infrastructure and requirements and this will be addressed in detail via the Area Local Plan, Master Plans and development briefs. Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Proposed scale of development for St Andrews will make it the fastest growing town in Fife, its infrastructure cannot support growth of such dimensions.

Response:

Full account has been taken of the infrastructure and requirements and this will be addressed in detail via the Area Local Plan, Master Plans and development briefs. Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

How many houses should there really be for local people and local workers? How many of the recent affordable homes are still affordable? Other options exist and must be explored by Fife Council.

Response:

The updated Housing Needs and Affordability Study identified a shortfall of just under 1,500 houses in the St Andrews housing market area. Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing. In addition the council is pursuing other measures to meet this shortfall. These include reduced Council Tax discount on second homes, seeking Pressured Area Status for the most pressing areas of need and use of surplus Council owned land.

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

What exactly is "St Andrews World Class"? And why does it figure so prominently in these documents? What is its accountability to the people of St Andrews.

Response:

St Andrews World Class is a partnership of local businesses and public agencies led by Scottish Enterprise Fife including Fife Council, and includes representatives of St Andrews Community Council, St Andrews Preservation Trust and St Andrews Merchant Association. It figures prominently as St Andrews is identified as a key centre in Fife. There is local input via Fife Council and the other local bodies.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Climate Change

Comment:

Turning St Andrews into a commuter town for Dundee and Edinburgh is in contravention of Fife Council's environmental policy to reduce carbon emissions in line with the Kyoto accord.

Response:

Strategy does not advocate increased levels of use of cars. Plan promotes medium and strategic scale development in areas which have good public transport links. There is strong support in the Finalised Structure Plan for increased use of public transport to service new development, and locational guidance to minimise travel, especially by car.

Action:

No Change

Comment No: 12

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Concern that no account has been taken of the consequences of further development in St Andrews on the already over-stretched schools.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

No Change

Comment No: 13

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

No account has been taken of the consequences of further development on the already overstretched health services in St Andrews.

Response:

The provision of new additional health care facilities is a matter for NHS Fife which is aware of the proposals for growing Fife's population 2006-2026.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Priority should be to quantify need for affordable housing within the town (St Andrews).

Response:

This is not a strategic planning issue and is more properly addressed by the St Andrews and East Fife Local Plan. Comment will be considered in that context. However the Housing Needs and Affordability Study does quantify the need for affordable housing at larger geographical levels.

Action:

Collier Cameron, Andrew - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Support for the Council's aims to revitalise the Fife economy in the face of a falling population, providing inadequate supply of affordable housing, and preserving and enhancing the landscape setting of St Andrews.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Objects to the large number of documents published given the short amount of time for the public consultation exercise. Also objects to being asked to consider the Structure Plan, which sets out overall targets, at the same time as the Local Plan, which sets out how and where these targets are to be met.

Response:

The Consultative Draft Structure Plan was in the public domain from November 2004 onwards. It was considered helpful to publish the Structure Plan and Local Plan at the same time. However, your comments are noted. The consultation process is under review to improve consultation in the future. Local Plans can be prepared on the basis of an emerging Structure Plan but they cannot be adopted unless they are consistent with the Approved Structure Plan.

Action:

Review consultation process.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

Concerned that the economic assumptions on which the draft Structure Plan is based appear flawed. Desire to grow Fife by 20,000 people in 20 years in the face of decreasing Scottish population is optimistic. The desired growth figure is double that of the past 20 years with most growth due to inward migration.

Response:

Concerns about economic assumptions and population growth noted. The Finalised Structure Plan has many positive factors which can assist in improving the economy. Agreed that growth target may be optimistic but it is achievable and consistent with official projections. Past growth rates are no reflection on the positive approach now being adopted.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

There is no assurance that businesses will locate to Fife which has a business start up rate below the national average. Fife Council over-emphasises St Andrews as the economic driver for Fife. St Andrews is treated as an economic resource to be exploited for Fife Council's economic gain. In doing so the Plan proposes a level of development that will do irreparable damage to St Andrews.

Response:

Concerns about economic assumptions and population growth noted. Business relocation and start-up rates are two separate issues. The first is addressed by providing suitable conditions for businesses to have the confidence to move to Fife. The second requires Fife Council and other agencies being supportive to those people worthy to start up new businesses. St Andrews has been identified in the National Planning Framework as an economic driver and it is intended that any new development will be planned in such a way so as to prevent damage to the town and its surroundings.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

The projected growth rate for St Andrews is well beyond the level at the infrastructure of the town's historic work can support. The infrastructure of St Andrews cannot support the scale of growth proposed. St Andrews Strategic Study stating "St Andrews is at its landscape capacity and no major expansion should take place, this would result in an unacceptable impact on the quality of the town environment'."

Response:

Full account has been taken of the infrastructure and requirements and this will be addressed in detail via the Area Local Plan, Master Plans and development briefs. The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements. Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Future developments of the University are not on the scale able to support the expansion proposed in Local and Structure Plans. Queries the position of the University as an economic driver on sufficient scale to justify the massive housing expansion proposed.

Response:

It is considered that St Andrews, and the University in particular, has the potential to play a vital role in encouraging new employment opportunities.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Strong support for the provision of an adequate supply of affordable housing in St Andrews. Hopes that the proposed means of achieving this will deliver.

Response:

Support noted.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Proposed scale of expansion of St Andrews over the next 20 years is unsustainable in terms of the pressure it will place on schools, health care and traffic and drainage infrastructure. The 1998 Strategic Study that "major new housing development would result in an unacceptable impact on the quality of the town environment" and "the quality of the town's environment is under threat from traffic congestion". The draft Area Transport Plan offers few solutions to existing travel problems, let alone the housing developments proposed.

Response:

Full account has been taken of the infrastructure and requirements and this will be addressed in detail via the Area Local Plan, Master Plans and development briefs. The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements. Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Questions who will buy the executive residences which are likely to be constructed in St Andrews. Concern that this will turn the town into dormitory suburb for Dundee, Edinburgh and the economically revitalised mid-Fife. This will lead to an increase in long-distance car commuting contrary to both the Scottish Executive transport hierarchy and Fife Council's environmental policies.

Response:

The type of housing to be constructed will be considered at the planning application stage. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

The Local Plan fails to deliver the Green Belt in anything like the form that was mandated by the Scottish Executive and incorporated in the 2002 Structure Plan. The proposed inner boundary of the Green Belt, ignores the recommendations of the landscape assessment study produced by Fife Council in 2003. The proposed boundaries make a mockery of the intended purpose of the Green Belt, allowing for large scale development in areas which is unnecessary and unacceptable.

Response:

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries.

Action:

Policy and text amended.

Comment No: 12

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Disappointed that none of Fife Council's share of the money provided recently by the Scottish Executive for affordable housing is to be spent in St Andrews.

Response:

Both Fife Council and Communities Scotland are aware of the identified shortage of housing in the St Andrews area. Consequently several developments have been financed in the area in the last few years. Recent projects in the St Andrews area amount to £5 million investment from Communities Scotland. Fife Council and Communities Scotland are consistently reviewing land availability in the St Andrews area and funding has been provided to Kingdom Housing Association to identify future opportunities for housing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Proposed developer led approach to provision of affordable housing has been shown to be unworkable. Developer led affordable housing ceases to be affordable the first time it changes hands on the open market. This is no solution.

Response:

Disagree. The provision of affordable housing through the planning system is a legitimate means of contributing to meeting the need for affordable housing, although it cannot meet the need in entirety. This approach is supported by Scottish Executive's planning policy. Many other Local Authorities across Britain are using this approach. Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the Council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

No Change

Comment No: 14

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Affordable housing must be provided in such a way that it remains affordable.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Suggests restriction on the sale of council housing, and housing association schemes on an appropriate scale.

Response:

The Council is actively pursuing Pressured Area Status for the areas in Fife with the most pressing need for affordable housing. Housing associations with charitable status (the majority) are currently exempt from right-to-buy legislation.

Action:

Falconer, Kenneth - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Proposed increases in population and housing are inappropriate for a small historic town such as St Andrews. 1998 Fife Council Strategic Study stated "St Andrews is at its landscape capacity and no major capacity should take place".

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

St Andrews skyline must be preserved and Green Belt retained in perpetuity rather than diluted. There should be no further development on the Southern side and a limit of building at the 40m contour. Development on the lower lying land to the West may be acceptable, but on a far smaller scale than suggested in the Local Plan.

Response:

The landscape issues have been fully considered as part of the process of delineating the St Andrews Green Belt boundary. It is not possible to define boundaries in perpetuity.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Design Quality

Comment:

New housing should be of sensible proportions. Concern over density of recent housing development and lack of overall design vision for St Andrews.

Response:

It is intended to address the issue of design, including density, by using the Master Plans and development briefs. Draft Plan Policy ENV3 will be included in Area Local Plans.

Action:

Draft Plan Policy ENV3 will be included in Area Local Plans.

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

No support for further input so called improvements for cyclists. (Experience is that recent schemes have made matters worse). Concerns over the safety of the contraflow cycle lane in Greyfriar's Gardens.

Response:

These are detailed issues to be addressed via the Local Transport Strategy and Area Transport Plan.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Though support for a rail link to St Andrews, would be much cheaper and achievable to provide an integrated transport system with buses between St Andrews and Leuchars trying to meet rail connections. Lack of bus services between St Andrews and Cupar, particularly in the evening, is unacceptable. Given the current state of public transport, it is hardly surprising that it is under used.

Response:

The detailed costings of the proposed rail link have yet to be undertaken. Concern about links between Cupar and St Andrews noted. The Finalised Structure Plan in conjunction with the Local Transport Strategy and Area Transport Plan seek to improve public transport service provision.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Full support for a rail link to St Andrews. Would be much cheaper and achievable to provide an integrated transport system with buses between St Andrews and Leuchars to meet main line rail connections. Lack of bus services between St Andrews and Cupar, particularly in the evenings is unacceptable. Given the current state of public transport, it is hardly surprising that it is under used.

Response:

Support noted. This issue is addressed by the Local Transport Strategy and Area Transport Plan.

Action:

Montford, Angela - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Issue of so many documents at the same time has created an almost impossible task for any member of the public who wishes to comment in a meaningful way. Comments on the Local Plan are a waste of time and will be irrelevant if the Structure Plan is subject to any major change. Structure Plan should have been issued and decided before the publication of the Local and Transport Plans.

Response:

The Consultative Draft Structure plan was in the public domain from November 2004 onwards. It was considered helpful to publish the Structure Plan and Local Plan at the same time. However, comments are noted. The consultation process is under review to improve consultation in the future. Local Plans can be prepared on the basis of an emerging Structure Plan but they cannot be adopted unless they are consistent with the Approved Structure Plan.

Action:

Review consultation process.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

The declining population and economy of Mid Fife should be addressed by dealing with the specific problems of that area, not by using St Andrews as an economic resource. A further expansion of the town would endanger the three successful economic drivers being the University, tourism and golf. New business, including the university and science parks, should be sited away from St Andrews. Further development within the town would only encourage further commuting which is incompatible with the council and the university's expressed aim to reduce car journeys and the associated pollution that arises.

Response:

The Finalised Structure Plan seeks to address the area specific problem of Mid Fife in that area but also recognises that other areas can contribute to improving the overall economy of Fife. The preferred location for new employment generating developments/businesses will depend on a number of factors including the labour skills needed by the employers. There may be scope to support manufacturing jobs in Mid Fife which arise from products developed by research and development works at St Andrews.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Concern over variation in population figures given for the town of St Andrews. Do the figures quoted include University students? Questions calculation of estimated increase in population from the number of houses proposed.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action

No change in planning for 5% growth.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

A proliferation of houses in multiple occupation in the town and buy to let landlords, has increased house prices within St Andrews and the pull of affordable housing. An artificial demand for new housing has been created. HMOs must be discouraged by stronger measures than those proposed in the local plan. Need for alternative mechanisms to supply affordable housing. Affordable housing must be maintained as such in perpetuity.

Response:

The important issue of HMOs is more properly addressed by the St Andrews and East Fife Local Plan. Agree that affordable housing should be retained. This is covered in Finalised Plan Policy H4 (Draft Plan Policy H5).

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Developer led housing projects to supply affordable housing will result in more houses being built in St Andrews. Over-development will result in increased flooding, pressure on local services and increased congestion and over crowding in the town centre.

Response:

This is not a strategic planning issue and as such is more properly addressed by the St Andrews and East Fife Local Plan. Comment will be considered in that context.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Concern over the definition of the Green Belt to allow further housing proposals. Concern that the boundaries proposed do not meet the requirements set by the Scottish Executive in the 2002 Structure Plan as they do not give due consideration to the landscape capacity of St Andrews. The 1998 strategic study recommended that no large scale expansion should be planned for St Andrews. The town centre is already under pressure and while the town is successful economically, unlimited expansion is neither desirable nor practical. The council must decide what maximum population growth will be permitted.

Response:

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries. The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements. Concerns noted.

Action:

Policy and text amended.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Re paragraph 1.24, there is no point in planning large amounts of affordable housing until the issue of retaining it in perpetuity is addressed.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Re Draft Plan Policy H5, questions the achievability of 45% affordable housing. Will it be possible to find developers to deliver this housing?

Response:

In the light of PAN 74, and the public consultation, the percentage requirement for the St Andrews housing market area has been revised to 30% in the Finalised Structure Plan and Supplementary Guidance on Affordable Housing. Finalised Plan Policy H4 (Draft Plan H4).

Action:

Change percentage requirement in Finalised Plan Policy H4 (Draft Plan H4)...

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Will affordable housing be allocated to those who have ties in St Andrews.

Response:

This is not a strategic land use planning issue. However, it is addressed in the Implementation Guide for Affordable Housing produced by the Council's housing service. Priority clients include those with a local connection.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Need for alternative mechanisms to supply affordable housing.

Response:

The Council is pursuing a range of alternative mechanisms to meet the need for affordable housing. This includes reduced Council Tax discount on second homes, suspension of right-to-buy in pressured areas and use of surplus Council owned land. Reference to this range of additional measures has been inserted into the supporting text.

Action:

Insert text to outline additional measures being taken.

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Affordable housing must be maintained as such in perpetuity.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

Quinault, Wendy - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Consider the explanation of the Structure Plan and Area Transport Plan given at meeting in St Andrews was most unsatisfactory. Officials did not appear to have a grasp of knowledge of facts and figures pertaining to St Andrews.

Response:

Comment noted. The formal section of the meeting was not intended to be an exhaustive question and answer session. It was intended that the informal session would allow members of the public to discuss the plans with members of staff and have their questions answered. The consultation process is under review to improve consultations in the future.

Action:

Review consultation process.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

In view of the scale of the consultation documentation, consider the period for consultation was far too short.

Response:

The Consultative Draft Structure Plan was in the public domain from late November 2004 onwards. The public consultation period was in excess of the statutory period and this was further extended to take account of comments submitted well beyond the closing date. It was considered helpful to publish the Structure Plan and Local Plan at the same time. However, your comments are noted. The consultation process is under review to improve consultations in the future.

Action:

Review consultation process.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Difficult to have confidence in draft plans when sources of population and other figures are not given and those that are do not tally from document to document.

Response:

Concerns noted. This issue will be addressed prior to finalising the Plans.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Why is there no inclusion of any plans the University of St Andrews may have to expand or develop further?

Response:

The detailed land use issues associated with any expansion University of St Andrews will be dealt with via the Area Local Plan, Master Plans and development briefs.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

In view of the number of houses proposed for St Andrews why is there no mention of plans for a new secondary school, increased medical and dental facilities, increased library and leisure facilities.

Response:

It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Insufficient provision of car parking spaces in the town centre for proposed new development.

Response:

These are detailed issues to be addressed via the Local Transport Strategy and Area Transport Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

The boundaries of the town and siting of the Green Belt should not be determined by housing developers.

Response:

The boundary of Green Belt shown in the draft Local Plan has been delineated by Fife Council.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Although there is a need for affordable housing, how many of these new houses will be of the executive type, or more importantly, become Houses in Multiple Occupation in no time at all?

Response:

Concerns noted. Affordable housing to meet local needs is addressed in the Plan. The detail of the balance of development for St Andrews is addressed by the Area Local Plan, which seeks to provide for a range of sites and tenures in order to promote mixed and balanced communities. The issue of Houses in Multiple Occupation is also addressed in the Area Local Plan.

Action:

No Change

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Houses in Multiple Occupancy

Comment:

Concerned developers can receive permission for new housing and then convert them to Houses in Multiple Occupancy (HMO) at a later date.

Response:

Noted. It is acknowledged that this is an important local issue. However as the Structure Plan is a strategic document, this matter is more appropriately addressed by the Local Plan process, especially the St Andrews and East Fife Local Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Houses in Multiple Occupancy

Comment:

Concerned about the growth in HMOs which is forcing families out and increasing the student population in the town centre.

Response:

Noted. It is acknowledged that this is an important local issue. However as the Structure Plan is a strategic document, this matter is more appropriately addressed by the Local Plan process, especially the St Andrews and East Fife Local Plan.

Action:

No Change

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Houses in Multiple Occupancy

Comment:

Concerned about HMO in ownership of absentee landlords, resulting lack of maintenance and lack of Council Tax generated by HMOs.

Response:

Noted. It is acknowledged that this is an important local issue. However as the Structure Plan is a strategic document, this matter is more appropriately addressed by the Local Plan process, especially the St Andrews and East Fife Local Plan. The issue of Council Tax is not a land use planning matter.

Action:

Williams, John & Elizabeth - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Re - Policy ENV1 Landscape Setting of St Andrews and Dunfermline. Proposals for St Andrews Green Belt are disappointing and inadequate. The maps are inadequate, difficult to read and there are no contours shown on the Plan. The boundaries as proposed bear little relationship to earlier surveys including 'A Green Belt for St Andrews' by David Tyldesley and Associates 1999. Full consideration must be given to a relationship between the town and its surrounding landscape, this must include the golf courses within the Green Belt boundaries.

Response:

Concerns noted. Local Plan map clearly defines the boundaries of the Green Belt.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

In terms of the size of St Andrews, 1800 houses cannot said to be medium scale development (para 2.7). Clear justification required for change in position from 2002 Fife Structure Plan which identified no housing shortfall until 2011. The current draft identifies a requirement of almost 500 over the period 2006-2011.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Design Quality

Comment:

Draft Plan Policy ENV3 Design Quality. Disappointed that only Fife wide design standards are mentioned. Special emphasis should be laid on Fife's conservation areas which are vulnerable to irreversible damage and should be accorded special protection.

Response:

Policy guidance on Conservation Areas is contained within the Core Local Plan policies which accompany all Area Local Plans. Draft Plan Policy ENV3 will be included in Area Local Plans.

Action:

Draft Plan Policy ENV3 will be included in Area Local Plans.

Barkla, Martin - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Concerned about the scale of growth allocated to St Andrews in the next twenty years.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Concerned about apparent lack of infrastructure to cope with resulting increase demand for transport, school facilities etc.

Response:

It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Concerned over further traffic generation, particularly in St Andrews town centre. Welcomes proposals to pedestrianise Market Street.

Response:

Concerns noted. A link road is proposed within the new housing to relieve traffic congestion.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Concerned over the uncertainty regarding the area on the South Eastern approaches to St Andrews.

Response:

The Draft Local Plan clearly sets out Fife Council's proposals for this area for Local Plan Period.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

Concerned that St Andrews role as the economic driver for Fife's redevelopment would place a considerable burden of the town.

Response:

Disagree. Whilst important, St Andrews is not the sole driver for the Fife economy. The land use requirement specific to St Andrews is specified as up to 20 hectares as per Finalised Structure Plan Proposal PE1.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Supports Fife Council for its initiative in regenerating Fife, but concerned over length of consultation period in relation to complexity of documents to be consulted on.

Response:

Support noted. The Consultative Draft Structure Plan was in the public domain from late November 2004 onwards. The public consultation period was in excess of the statutory period and late submissions were accepted. It was considered helpful to publish the Structure Plan and Local Plan at the same time. Your comments are noted. The consultation process is under review to improve consultation in the future. The formal section of the meetings were not intended to be exhaustive question and answer sessions. It was intended that the informal session would allow members of the public to discuss the plans with members of staff and have their questions answered.

Action:

Review consultation process.

Stother, Jacqueline - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Large scale development of St Andrews would destroy the very features which make it unique.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

St Andrews current problems of street congestion, shortages of affordable housing, student housing, and overcrowded schools, are not addressed by the plan.

Response:

The Finalised Plan identifies new development which will provide with it a new link road to relieve traffic pressure. The Council are considering the school capacities through the School Estates Strategy which takes account of the development proposed in the Development Plan across Fife.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Need for transport improvements such as rail link and improved road links, before any major residential or tourist developments are permitted in St Andrews. A new secondary school to serve North East Fife could also assist in reducing some traffic congestion in St Andrews.

Response:

The required infrastructure will be in place timeously to service new development. For rail link situation see Finalised Plan Proposal PT1(Draft Plan Proposal PT2). Fife Council has undertaken a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public consultation.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Until there are sustainable transport links with St Andrews, residential development should be concentrated in Cupar and Leuchars, which have public transport links to Dundee and Edinburgh.

Response:

The required infrastructure will be in place timeously to service new development, as detailed in Finalised Plan Policy DC1 and Finalised Plan Proposal DC1. Finalised Plan Proposal PT1 (Draft Plan Proposal PT2) gives further consideration of transport projects, which are also listed in the Action Plan. Service issues for public transport are addressed through the Area Transport Plan and Local Transport Strategy.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Fife Council cannot count on a continued increase in student numbers at University of St Andrews.

Response:

This is not an issue for Fife Council involvement.

Action:

Lowe, Sandra - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Object to the scale of development proposed for St Andrews.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Wilkes, Sharon J - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Market Areas

Comment:

Object to use of terminology "Housing Market Areas".

Response:

The term is used extensively in Planning Guidance and Advice e.g. in SPP3: Planning for Housing, and PAN 38 'Housing Land'.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

The infrastructure of St Andrews is unfit to cope with the present population and cannot take a significant increase in population. Services such as schools, health care, policing, are equally unable to cope with further growth.

Response:

It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

The proposals in the Development Plan would result in irretrievable damage to the landscape setting of St Andrews. Concerned over the reliance on St Andrews as an economic driver.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. It is considered that St Andrews has the potential to play a vital role in encouraging new employment opportunities. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Cormack, Edith - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

Supports the comments and objections made by St Andrews Community Council, St Andrews Preservation Trust and Friends of St Andrews.

Response:

Support for these organisations noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Considers the proposed expansion for St Andrews to be too large and inappropriate for a town of its size.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

St Andrews World Class concept is a costly marketing ploy that will have some short term impact but little else.

Response:

Disagree. Project will have positive long-term benefits.

Action:

Picken, John - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Concern over proposed boundaries of Green Belt which extends too far to the south of the town. Queries the need for a Green Belt when current planning policies presume against large scale green field development. Green Belt restrictions could compromise the viability of the farms in the area.

Response:

Detailed comments re boundary of Green Belt should be addressed via the Local Plan process. The Green Belt as delineated provides for long-term development needs and protects remaining areas. Green Belt policies should not adversely impact on most agricultural activity.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Supports the construction of a ring road for St Andrews.

Response:

Support noted. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 houses are proposed over the next 20 years. This allocation is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town. Transport proposals will be taken forward through the Local Transport Strategy in conjunction with the Area Local Plan and masterplanning of the Strategic Development Area.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Rural Economy

Comment:

Intends to diversify farm business by developing tourist accommodation. Also proposes to submit plans for several clusters of housing on the sites of old steadings and at land North of Cameron Village. Would also like land considered for future golf course. Asks that Fife Council adopt the road that connects the A915 to the Grange Road.

Response:

These are not strategic planning issues. Proposals will be considered by Fife Council when the appropriate planning application is submitted. Road adoption is a matter dealt with by Transportation Services.

Action:

Bowie, J - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Concern over expansion of St Andrews as proposed in the Structure Plan. This reverses the 1998 Fife Council Strategic Study which concluded that no major expansion should take place.

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Concern that affordable housing built in St Andrews does not remain affordable.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

There is need for a new secondary school in the Newport/Tayport area.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Tourism

Comment:

Concern that the growth in tourism will destroy the experience for both the visitor and the residents of St Andrews.

Response:

Concerns noted. However, other important locations cope with greater visitor numbers without undue problems and lessons can be learned. It is intended that any new development will be sympathetic to, and in harmony with, Fife's sense of place thereby preventing any adverse impact on the tourism industry.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The University should be encouraged to build more halls of residences to address housing demand.

Response:

This is not a strategic planning issue and as such is more properly addressed by the St Andrews and East Fife Local Plan. Comment will be considered in that context.

Action:

Purvis, Louise S D - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Objects to allocation of 1800 houses in St Andrews. The infrastructure in St Andrews cannot support a population rise of 16%.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

Identifying St Andrews as the economic driver for Fife may destroy the historic character of the town.

Response:

St Andrews has been identified as an economic driver, but not the sole one, and it is intended that any new development will be planned in such a way so as to prevent damage to the town and its surroundings.

Action:

Donaldson, Neil - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Appreciate that Fife needs more housing, but this needs to be at an affordable level and remain affordable. Does not support further development unless affordable housing targets are addressed.

Response:

Support in principle noted. Presumably comment refers to low cost housing for sale, which is only one means of delivering affordable housing. Where this tenure is being considered, affordability will be determined by house prices and average household incomes which do vary across Fife. The updated Housing Needs and Affordability Study has been used to determine target house prices. These are set out in the Implementation Guide. Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on affordable housing. The provision of affordable housing is one of Fife Council's key objectives.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

The eight week consultation period for the Structure Plan and Local Plan is too short.

Response:

The Consultative Draft Structure Plan was in the public domain from late November 2004 onwards. The public consultation period was in excess of the statutory period and this was further extended to take account of comments submitted well beyond the closing date. It was considered helpful to publish the Structure Plan and Local Plan at the same time. However, your comments are noted. The consultation process is under review to improve consultations in the future.

Action:

Review consultation process.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

Concern over identification of St Andrews as the economic driver for Fife.

Response:

St Andrews has been identified as an economic driver, but not the sole one, and it is intended that any new development will be planned in such a way so as to prevent damage to the town and its surroundings.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Queries the need for so many new homes over the next 20 years and its implications for a Green Belt for St Andrews.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. The Green Belt boundary has been delineated to ensure adequate land is available to meet need of the period to 2026 and provides a defensible boundary.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Fraser, K C - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Proposed expansion of St Andrews by 1800 houses is too high. This is in contrast to the previous Local Plan which envisaged quite moderate numbers of new housing. Questions this change of view being based on population projections supplied by the General Register Office for Scotland. The local authority should not merely assume that present trends will continue. Should ask whether St Andrews ought to continue to grow at current rates. Suggests that 500 houses over 20 Years would be a more reasonable figure.

Response:

Housing need figures calculated by Fife Council using Scottish Executive specified methods. The number of houses proposed for St Andrews identified for St Andrews in The Finalised Structure Plan is considered to be appropriate for the 20 year period to 2026.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Urges Fife Council to make affordable housing their priority as there is a considerable and justified local demand in St Andrews.

Response:

Comment noted. This is not a strategic panning issue and as such is more properly addressed by the St Andrews and East Fife Local Plan. Comment will be considered in that context. Fife Council is however well aware of the shortage of affordable housing in the St Andrews Housing Market Area and is taking steps to address this.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Welcomes general proposals for a Green Belt at St Andrews, but not the boundaries as proposed. Present proposals fall short of a full green belt in two respects:1. The hillside to the south of the town appears to be of uncertain status. 2. The Green Belt in the vicinity of Craigtoun Road is too narrow and cannot be called a Green Belt in any meaningful sense.

Response:

Welcome for general proposals noted. Matters relating to the details of the boundary proposed are a Local Plan issue.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Support for restoration of a rail link to St Andrews. Structure Plan and Local Plan should forbid any development on the route identified for the railway line.

Response:

Support for road link noted. The Finalised Structure Plan Proposal PT1 and Policy T2 address the issue of protecting routes which will be identified in detail in the Area Local Plan.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

New affordable housing must remain affordable.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

Mitchell, Cathy - Dundee

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Objects to scale of housing proposed for St Andrews. Such development would have a detrimental effect on the southern Green Belt area of the town and on traffic in St Andrews.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. The Green Belt has been delineated taking full account of the landscape issues. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Selwyn, Flora - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Presentations at public consultation meetings were too long. Meetings should begin straight away with a question and answer section.

Response:

Concerns about length of presentations noted. Presentations were meant to provide information and context. The informal part of the meeting was intended to provide the main opportunity for questions and answers.

Action:

Review consultation process.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Concern that there is no accurate figure for the population of St Andrews. Nor is there an acceptable answer as to why St Andrews should increase in size. Any increase in population should follow form improved and maintained infrastructure, rather than increase pressure on existing resources.

Response:

There were problems over the population figures for St Andrews. However, these have been resolved

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing and to facilitate a new link road for the town.

Action:

No change in planning for 5% growth.

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

What type of housing is proposed for St Andrews and how many people will these houses generate?

Response:

This is a detailed issue to be addressed via the Area Local Plan, Master Plans, development briefs and individual site permissions. The Structure Plan provides the Strategic context e.g. the number of houses required. The Local Plan thereafter provides the detail e.g. specific sites to meet the identified requirement. Housing need figures calculated by Fife Council using Scottish Executive's specified methods. The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Affordable housing does not remain affordable.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

There is no mention of the University of St Andrews' obligations to the town as a major employer and developer.

Response:

This is not an issue which needs to be singled out for specific mention in the Structure Plan. The Plan does however recognise the significant contribution the University makes to the Fife economy and identifies the need to increase the contribution science and technology make to the Fife economy.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Glenrothes should be further developed to prevent over development of St Andrews.

Response:

New housing is required to be provided within each of the Housing Market Areas within Fife, as detailed in the Report of Survey accompanying the Finalised Plan. These settlements are within different Housing Market Areas.

Action:

No change.

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Houses and flats become houses in multiple occupation and are not controlled.

Response:

The issue of HMOs is more properly addressed by the St Andrews and East Fife Local Plan. Comment will be considered in that context.

Action:

Streatfield-Jones, - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Concern over aim of Structure Plan to grow Fife by increasing its population from 350,000 to 370,000 by 2026. No satisfactory explanation for the need for this policy. Particularly concern over effect of this increase on St Andrews.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Accept need for affordable housing in St Andrews, but this should be preserved as affordable under the control of Housing Trusts or Societies.

Response

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Future public meetings should be conducted by Councillors and not by members of staff. Chair of meeting was an elected member.

Response:

Suggestion noted.

Action:

Review consultation process.

Mundie, Douglas S - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

The consultation meeting in St Andrews did not provide clear knowledgeable answers to the questions posed by the public. Feel that public meeting was an exercise the Council was required to be seen to carry out. Have little confidence that local opinion will be taken into account when decisions are made.

Response:

The presentations could not, in the timescale, go into detail. The questions were answered honestly and directly. Those who did not have time to attend the meeting had the opportunity to raise questions with officials. Officials were available prior to and after the meeting to discuss proposals. All the comments made are carefully considered, but will not always result in a change to the Plan. The consultation process is under review to improve consultation in the future.

Action:

Review consultation process.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Concern over lack of a definitive figure for the population of St Andrews. Without an accurate starting point for existing population statistics, how can coherent proposals be developed?

Response:

Concerns noted. Population issues are being examined. Details which resolve this issue are contained in the Finalised Report of Survey.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

No clear answer as to where the forecast demand for new additional housing in St Andrews comes from. Concern that separate consultation on provision of secondary schooling was not included. How then could this take into account any additional population figures arising from the proposed expansion of the town. Concern that any expansion of RAF Leuchars is not addressed in terms of educational need. Need closer links between housing proposals and education proposals in the Tay Bridgehead area.

Response:

Housing need figures calculated by Fife Council using Scottish Executive specified methods. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Roads

Comment:

Roads in North East Fife are in a significantly worse state of repair than those in Central and West Fife. In relation to the Council's policy towards repairing roads damage such as potholes, when will the Council learn that cheap solutions lead to increased cost in the medium term: Note that this is principally a comment towards the draft Area Transport Strategy.

Response:

Fife Council has an ongoing programme of road repairs and projects as outlined in the Area Transport Plan.

Action:

Comments passed to Transportation Services.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Questions why a population decline in Central Fife should be a driver for further housing growth in St Andrews.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 200 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section of demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Asks why the Green Belt recommendations contained in the 2002 Structure Plan have been discarded in favour of the new proposed Green Belt for St Andrews. Local opinion supports previous recommendations.

Response:

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries.

Action:

Policy and text amended.

Thain, Eric - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

General support for Fife Council's aim to develop the Fife economy, particularly in Mid Fife, in an environmentally friendly way.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Density

Comment:

Even given with aspirational population growth on top of present trend, town and settlement centred development results in leads to excessive density levels, particularly St Andrews and possibly Dunfermline. The plan should accurately address physical limits to sustainable density.

Response:

Disagree. Draft Plan Policy H8 now Finalised Plan Policy H6 aims to secure efficient and sustainable use of land for residential development and Draft Plan Policy ENV3 addresses the quality of design, which should respect context and integrate with surroundings. Draft Plan Policy ENV3 will be included in Area Local Plans.

Action:

Draft Plan Policy H8 now Finalised Plan Policy H6. Draft Plan Policy ENV3 will be included in Area Local Plans.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Roads

Comment:

The plan ignores provision for the mobility of private cars. Need to provide excellent public transport system rather than an anti car policy.

Response:

Disagree. The Finalised Structure Plan, in partnership with the Local Transport Strategy and Area Transport Plans, aims to provide for accessibility and transport choice. Finalised Plan Proposal PT1 (Draft Plan Proposal PT2) lists key transport proposals at a Fife-wide level, which address both public and private transport.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Support public transport proposals contained in draft Plan and considers the provisions (for longer faster trains, comfortable stations with integrated transport) that will make the journey along the Aberdeen/Newcastle corridor a better experience should be spelled out. The importance of new Edinburgh Airport station to Fife is so high, that Structure Plan should clarify the design option that would most benefit Fife.

Response:

Support noted. Transport Initiatives Edinburgh (TIE) has been commissioned by the Scottish Executive to develop a rail scheme to provide direct access to Edinburgh Airport from the rail network. The scheme has been deleted from Finalised Plan Proposal PT1. Further detail of transport proposals is contained in the Local Transport Strategy.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

The efficiency and reliability of wind farms and biomass for energy production are far from proven. The Structure Plan should address, as a contingency if nothing else, the potential to derive power from nuclear energy over the next twenty years and the land use implications of this.

Response:

Disagree. Wind and biomass are well-established technologies. Decision on future of nuclear power is currently subject to review by UK Government.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Concern over the community benefits and of the provision of infrastructure through developer contributions being provided in advance of future development. Suggests that any partnership in relation to infrastructure between Fife Council and private developers should engender an effective reduction in the present level of Council Tax and Business Rates.

Response:

Council Tax is set to contribute to provision of all Fife Council services. Business Rates are set by Scottish Executive, not Fife Council and Fife Council has no discretion in this matter.

Action:

Hopper, Lorraine - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Asks what has changed since 1998 Strategic Study and 2002 Finalised Fife Structure Plan to justify their proposed development proposals for St Andrews: What underlines the assumption that Fife population and St Andrews in particular will increase when the population of Scotland is declining? Is this because St Andrews has been identified as the economic driver for Fife? If so a focus on the golf industry and tourism would not automatically lead to an increase in the population of St Andrews as provision of executive housing would lead to further commuting. The forecast increase in University graduates does not justify the proposed increase in housing planned.

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. St Andrews has the capability of contributing to the provision of additional new employment, the forecast growth in population is not in the number of University students.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Genuine need for affordable housing, but should be on sites already designated for building.

Response:

Support in principle noted. The scale of the affordable housing shortage in Fife is such that is not practical. In any event it is not possible to amend planning permission respectively. Many sites already have planning permission.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Any increase in the size of St Andrews will destroy its landscape setting, lead to traffic gridlock and detract from the very reasons for choosing St Andrews as the economic driver for Fife.

Response:

The proposed expansion of St Andrews will be identified in detail through the finalised St Andrews and East Local Plan, within the context of the Green Belt boundaries which protect the landscape setting of the town.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Affordable housing should be managed so that it is truly affordable in perpetuity.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

Vincent, Fiona - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Objects to paragraph 1.2 Chapter 1, in which the vision is of Fife's population in 2026 having reached 370,000 and is still expanding. As the population of Scotland as a whole is falling, why should Fife Council seek to increase population? Concerned that a higher population will lead to greater demand for public services, and with an ageing population the extra demand is likely to be greater than the extra income. A clear argument has not been made to support a Fife population of 370,000. Need to improve existing public services before increasing the population. Re "Fife in 2026" this is vague about the new jobs to be created, except for describing a thriving construction industry to deliver housing. This implies that new houses are to be built simply to provide work for the construction industry.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Tourism

Comment:

Paragraphs 1.8 and 1.4 refer to St Andrews as a tourism destination and a visitor destination. Need further explanation of St Andrews as a "World Class Tourist Destination". Stresses that St Andrews is also a home for people who should be consulted on their preference for the future.

Response:

The promotion of St Andrews World Class is to be delivered by a locally based partnership. It is acknowledged that consultation with local communities is very important. Specific proposals which emerge will be the subject of public debate.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Density

Comment:

Objects to paragraph 1.22 "a higher average density within housing developments would be required, raising the quality and standard of housing will have health and social benefits". Suggests that housing density will in fact have detrimental effects, both on health and socially.

Response:

Objection noted. Disagree, as best practice shows that adopting higher density standards for residential development would result in lowering of greenfield land requirements which will deliver sustainable use of land without any loss in residential quality.

Action:

Finalised Plan Policy H6 (Draft Plan Policy H8) revised to address concerns about density issues.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Objects to paragraph 2.7 "the strategy is to develop St Andrews as an economic driver for the whole of Fife in terms of academic development and tourism". Does not see how increased academic activity in St Andrews, or even increased tourism, will bring economic benefit for the whole of Fife. Suggests that large numbers of expensive houses will bring in large amounts of Council Tax which Fife Council can then spend in less fortunate areas. Objects to St Andrews being used as a "cash cow".

Response:

St Andrews has the potential to play a vital role in encouraging new employment opportunities. It is acceptable that economic benefits not confined to the immediate area. The provision of new housing is not driven by Council Tax considerations.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Strongly objects to paragraph 3.22 "St Andrews does not have the capacity for much additional retail development, but ought to be managed by focussing on tourism and visitor related retailing". Current retailing in St Andrews focuses on tourist spend, to the detriment of retailers serving local needs. Many commodities are now difficult or impossible to buy in St Andrews or choice is limited.

Response:

Objection noted. Wording in para 3.22 (now 3.31) has been deleted. The planning system can only exert limited control over types of retailing, especially if change of use falls within the same Use Class Order. The importance of St Andrews town centre's local role is acknowledged.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Strongly objects to Schedules H1 and H3. No explanation for housing land requirement for St Andrews & East Fife and in particular the medium scale allocation at St Andrews. Para 4.27 refers only to the need for further employment land and affordable housing. Questions whether increasing the total population of Fife is desirable, and why the population of St Andrews needs to expand on such a scale. This is not justified by increased employment at either the University or RAF Leuchars. Proposed expansion of St Andrews contradicts the 1998 Fife Council Strategic Study and the 2002 finalised Fife Structure Plan. There is no explanation of why Council policy has changed. Paragraph 2.7 suggests that the policy change is due to pressure from development industry. It is unacceptable to meet demand for commuter housing or retirement accommodation. Meeting these market segments would put more strain on existing services and increase commuter traffic.

Response:

The Report of Survey sets out the detail of the housing land requirement and allocations, with the scale of development proposed for St Andrews appropriate to meet local needs over the period 2006-2026. The 1998 Study was to inform the replacement for the 1994 Structure Plan, which was approved in 2002. Significant changes have taken place since then which require the provision of land for new development for the period 2006-2026 and the emerging Development Plan is addressing these requirements.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Serious reservations about Policy H5 on affordable housing. St Andrews needs affordable housing, but requiring private developers to provide is not the only or even the best strategy. Requirement for 45% affordable housing in St Andrews is well above Scottish Executive guidelines and developers are unlikely to accept it. Final figure could be as low as 15%, so for every new affordable house, St Andrews will have between 1.2 and 5.7 new unaffordable houses.

Response:

The provision of new affordable housing through the planning system is a recognised and legitimate method of delivery, which is supported by the Scottish Executive. However, it can only make a contribution and cannot meet the shortfall in entirety. Other means of provision will also be used including Communities Scotland investment through Housing Associations, use of surplus Council owned land, reduced discount on second homes and Pressured Area Status. The percentage requirement for the St Andrews housing market area has been revised to 30% in line with PAN 74, the updated Housing Needs and Affordability Study and the public consultation.

Action:

Change percentage requirements in Finalised Plan Policy H4 (Draft Plan Policy H5).

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Affordable housing is no use unless it stays affordable.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Also need to ensure that affordable housing is only offered to those with a real connection with the local area

Response:

This is not a strategic land use planning issue. However, it is addressed in the Implementation Guide for Affordable Housing produced by the Council's Housing Service. This includes applicants with a local connection. It is not feasible to offer affordable housing only to those with a local connection, as some provision must be made for incoming workers for example.

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Alternatives must be considered, for example, allowing only Housing Associations to build. In the Lake District, people are only allowed to buy a house if they were born, brought up, or if they work in the area; such a scheme could be a viable solution for St Andrews.

Response:

Comment noted. Various methods of delivering affordable housing are being actively pursued by Fife Council. The scale of the affordable housing shortage in Fife is such that Communities Scotland investment through housing associations is unable to address this in entirety. The Implementation Guide on Affordable Housing, produced by Fife Council's Housing Service, sets out priority client groups including provision for those with local connections. However, some provision must be made for incoming workers for example.

Action:

Vernon, Michael - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Objects to the scale of development proposed for St Andrews which would irretrievably damage the landscape setting and increase road traffic and congestion. Objects to proposed development on the western edge of the town.

Response:

Objection noted. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

The Local Plan fails to deliver the Green Belt mandated by the Scottish Executive. Proposed Green Belt boundaries allow extensive land for building in areas that would ruin the landscape setting of St Andrews.

Response:

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries.

Action:

Policy and text amended.

Sinclair, Bruce - Strathkinness, St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Serious concerns about the scale of development proposed for St Andrews and nearby villages. This is in contrast to strongly held view of local population that such an expansion is inappropriate. It is also in contrast to the views expressed by Fife Council in its Strategic Study of 1998. There have been no major changes in St Andrews in the interim apart from increasing pressure from housing developers. The arguments are strongly against major new housing development in St Andrews and the surrounding villages.

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action .

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Strong local support for a Green Belt around St Andrews. Requests that Strathkinness be included within the proposed Green Belt to prevent coalescence with St Andrews.

Response:

Support for St Andrews Green Belt noted. Suggestions re the details of the proposed boundary are a Local Plan issue.

Action:

Donald, lain - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

No advantage in putting forward a draft Structure Plan and draft Local Plan within the same consultation period. Surely the Local Plan can only be discussed once the Structure Plan has been agreed. Too many documents out to consultation with the eight week period provided.

Response:

The Consultative Draft Structure Plan was in the public domain from late November 2004 onwards. It was considered helpful to publish the Structure Plan and Local Plan at the same time. Comments are noted. The consultation process is under review to improve consultation in the future. Local Plans can be prepared on the basis of an emerging Structure Plan but they cannot be adopted unless they are consistent with the Approved Structure Plan.

Action:

Review consultation process.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Concerned that Strategy seeks a population growth of 5% over the next twenty years, when historic growth rate over the past twenty years is less than 1.5%. Questions predicating all planning on the basis of such an accelerated rate of growth. This assumption for Mid Fife is arguable given the problems of that area. Difficult to understand why such growth should be applied to St Andrews and East Fife generally.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Plan does not demonstrate the need for the proposed scale of new development. Disappointed that landscape capacity report is ignored in relation to assessing the ability of St Andrews to absorb further development.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Broadly agree that affordable housing is needed in St Andrews, but unclear how that need has been established and if all mechanisms as to how this need might be met have been explored.

Response:

Support in principle noted. Fife Council's approach to meeting the need for affordable housing has been informed by the updated Housing Needs and Affordability Study, which identified a need for just under 1,500 new affordable houses in the St Andrews housing market area. The Council is actively pursuing a number of mechanisms to address this in addition to developer contributions. These include use of surplus Council owned land, Pressured Area Status and reduced Council Tax discount on second homes. Reference to this range of additional measures that the Council is pursuing has been inserted into the supporting text.

Action

Insert text to outline additional measures being taken.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Water and Drainage

Comment:

Concerned that the University's proposals for development to the west of St Andrews will exacerbate existing drainage capacity problems.

Response:

The Finalised Structure Plan seeks the timely provision of appropriate infrastructure in support of new development, as detailed in Policy DC1and Proposal DC1. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. The Area Local Plan and masterplan will ensure that development is integrated and phased, and that appropriate infrastructure is delivered.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Do not agree with proposed Green Belt boundaries, because of the development proposals and the impact on the landscape. Proposals outlined in Landscape Capacity Study are acceptable and in line with views of St Andrews residents.

Response:

The Green Belt boundary depicted in the St Andrews and East Fife Local Plan is that preferred as it provides for both development and conservation objectives.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Proposal that affordable housing can only be achieved in St Andrews through planning gain is flawed.

Response:

The scale of the affordable housing shortage in Fife, and especially in the St Andrews housing market area, is such that a variety of mechanisms are required in order to address it. In such situations, the planning system can make a contribution. This approach is supported by the Scottish Executive. Many other local authorities throughout Britain are using this approach, which is a recognised and legitimate means of delivering affordable housing. It is, however, only one means of doing so and Fife Council is also actively pursuing other means of delivery.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Considers the 45% target to be very optimistic at best. Suspects that the Council is likely to achieve a percentage similar to that proposed by The Scottish Executive.

Response:

The percentage requirement has been revised to 30% for the St Andrews housing market area in line with PAN 74, the updated Housing Needs and Affordability Study and the public consultation. Draft Plan Policy H5 now Finalised Plan Policy H4.

Action:

Change percentage requirements in Finalised Plan Policy H4 (Draft Plan Policy H5).

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

A considerable number of the affordable housing units identified for St Andrews could be provided on brownfield sites within the town, windfall sites and possibly on sites identified during the landscape capacity study.

Response:

This is not a strategic planning issue and is more properly addressed by the St Andrews and East Fife Local Plan. Comment will be considered in that context. However the Council's preference is for reuse of brownfield land as opposed to greenfield lands release.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Need for the remaining 55% of housing is unclear. To justify the affordable housing requirement, the balance of housing will be high density and high value which is likely to be out of reach of residents of St Andrews, attracting further commuters to the town.

Response:

Further work is being undertaken to reassess the housing land requirement and housing land allocations. The Report of Survey details the calculation of the housing land requirement and the justification for the figures arrived at for St Andrews and East Fife. The Development Plan sets out a framework for delivery of housing to meet local needs and to provide for a range of sites, tenures and house types in order to promote mixed and balanced communities. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Craik, Alan D D - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

The plan does not adequately reflect the Scottish Executive's Green Belt policy.

Response:

The detailed Green Belt policy guidance is contained in the Draft St Andrews and East Fife Local Plan which complies with Government guidance. The Scottish Executive has issued a Scottish Planning Policy (SPP) note on Green Belts which updates Circular 24/1985. This has been taken into account in finalising both the Structure Plan and the Local Plan.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

The extent and location of new housing in St Andrews would be detrimental to the ambience of the town. The proposed further increase is excessive and will further erode the unique position of St Andrews as a small University and tourist town.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The acknowledged need for affordable housing in St Andrews would not be met effectively by developer led projects.

Response:

Support for affordable housing in principle noted. The planning system can only make a contribution to meeting the need for affordable housing; it cannot address it in entirety. Reference to a range of additional measures that the Council is pursuing has been inserted into the supporting text.

Action:

Insert text to outline additional measures being taken.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Affordable housing will only remain so if it cannot be sold on at market value after a few years.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Fife Council should implement its own affordable housing building programme on available gap sites.

Response:

Current Fife Council policy is not to build Council housing, due to right-to-buy legislation, but this may be reviewed in due course.

Action:

Uprichard, P M - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Six documents out to consultation at the same time is excessive. Two days were lost from the consultation period due to 1st May being a Sunday and 2nd May, the closing date, being a public holiday.

Response:

The Consultative Draft Structure Plan was in the public domain from late November 2004 onwards. The public consultation period was in excess of the statutory period and this was further extended to take account of comments submitted well beyond the closing date. It was considered helpful to publish the Structure Plan and Local Plan at the same time. However, your comments are noted. The consultation process is under review to improve consultation in the future. In view of the concerns expressed about the timescale for consultation comments were accepted for some time after the official closing date.

Action:

Review consultation process.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

Consider view that Fife Council will not be able to implement this large and complicated plan.

Response:

The Plan will be implemented by Fife Council in partnership with a number of agencies and the private sector.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

The scale of development proposed for St Andrews would seriously affect its character and attractiveness. Conclusion of 1998 Strategic Study that "St Andrews is at its landscape capacity and no major expansion should take place". The Strategic Study also says that there is no local requirement for new housing land until 2006, other than that already allocated in the adopted Local Plan. The Strategic Study is still a material consideration and requests that attention is paid to it. Scale of development proposed for St Andrews would destroy its landscape setting.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Re: Paragraph 1.12. The Strategy to grow the population of Fife. Migration would have to average 1500 per year, which is double the projected rate, to reach the 370,000 target. What is the justification for this and where will all the new residents come from?

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Action:

No change in planning for 5% growth.

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Re: Paragraph 1.15 "St Andrews will be developed as a World Class Destination". Many consider that it is already, how will Fife Council achieve this development? Dislikes use of term 'World Class'.

Response:

Town Centres including retailing are dynamic and must adapt to change. Agree that St Andrews is already a World Class destination and one of the plan's aims is to maintain and enhance this status. The term "World Class" relates to a local project involving Fife Council and Scottish Enterprise Fife.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Re: Paragraph 1.15 "development of these key town centres is key to the growth of the Fife economy". Considers this will be difficult to achieve given Transportation Services plan for pedestrianisation and parking restrictions in St Andrews town centre.

Response:

Concerns noted, however the main drivers for addressing the pedestrianisation and parking issues are the Local Transport Strategy and Area Transport Plan. Future development will involve a range of issues in addition to transportation.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Re: Paragraph 1.16 "to develop St Andrews as a "World Class Tourist Destination" How would Fife Council achieve this and is it within their remit?

Response:

The World Class project is being taken forward by a locally based partnership including Fife Council and Scottish Enterprise Fife.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Re: Paragraph 1.18 "increasing modal shifts to public transport" it should be remembered that residents of and visitors to (St Andrews) have the option of going elsewhere and the use of the park and ride scheme has not been overwhelming.

Response:

Concerns noted, although many popular destinations such as Bath, York and Edinburgh also have restrictions on long term parking in town centres yet retain their attraction for visitors. However this is more of a detailed issue and as such more appropriate to the St Andrews and East Fife Local Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Re: Paragraph 1.20 of Draft Plan "a culture of life long learning will be assisted through the spatial strategy by the location and provision where required". What does this mean? Is it a change from the present situation?

Response:

Education regime does not only relate to children of school age, but to lifelong learning. The provision of educational facilities to meet the needs of everyone will bring attendant benefits to the Fife Economy.

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Design Quality

Comment:

Re: Draft Plan Paragraph 1.22. Support for raising of the standard and overall quality of new development.

Response:

Support noted. Draft Plan Policy ENV3 will be included in Area Local Plans.

Action:

Draft Plan Policy ENV3 will be included in Area Local Plans.

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Medium growth is not appropriate for a town the size of St Andrews. Council has approved many applications for brownfield sites which might otherwise be used for affordable housing.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Re: Paragraph 1.26 "population will continue to steadily increase to sustain communities". Considers that St Andrews is sustainable now.

Response:

Comments noted. New development will be planned via Area Local Plan, Master Plans and development briefs, to ensure that the growth of the town is achieved in a sustainable manner.

Action:

No Change

Comment No: 13

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Re: Paragraph 1.28 "Green Belt will be designated through the Local Plans at St Andrews". Why have the Areas of Great Landscape Value been removed from the Plan, and why is there no reference to protection for the built coast. The Green Belt boundaries proposed in the local plan do not deliver the green belt as outlined in the 2002 Structure Plan. Re: paragraph 1.29, it is not possible for a Green Belt to both protect the landscape setting of the historic core and to accommodate high quality growth.

Response:

Local landscape designations are under review and may be deleted. Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries.

Action:

Policy and text amended.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Objects to scale of development proposed for St Andrews, particularly if this building results is developing on green field land.

Response:

Whilst the Finalised Structure Plan strategy is very supportive of using brownfield land, there are some areas where greenfield land must be released in order to permit planned development.

Action:

No Change

Comment No: 15

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

Queries why St Andrews should be burdened with being an economic driver for the whole of Fife.

Response:

St Andrews will not be the sole economic driver for the whole of Fife but it does have the potential to make a significant contribution to securing new employment opportunities.

Action:

No Change

Comment No: 16

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Re: Paragraph 3.3. Will the Council be able to extract appropriate contributions?

Response:

It is intended that Fife Council will implement the approach specified in the Finalised Structure Plan with regard to Developer Contributions. The appropriate level of contribution will require to be determined via Area Local Plans, Master Plan and planning brief mechanisms.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

Re: Paragraph 3.13. St Andrews World Class as key economic driver within Fife. Title "World Class" should be changed.

Response:

This is a reasonable aspiration for St Andrews to be a world class destination as it has many good features which attract visitors world wide.

Action:

No Change

Comment No: 18

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Re: Paragraph 3.22. Who will manage St Andrews as a World Class destination? Re: Paragraph 3.27. Who will monitor the retail sector?

Response:

The World Class project is being taken forward by a locally based partnership which includes Fife Council and Scottish Enterprise Fife. Fife Council has been and will continue to monitor retailing trends in Fife, to underpin policy development. This is set out in more detail in the Report of Survey.

Action:

No Change

Comment No: 19

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Re: Policy objective "preventing over development in rural East Fife". Consider that the entire Plan is about over development.

Response:

Disagree. The Plan strategy seeks to achieve planned development.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Re: Paragraph 3.46. How will walking and cycling be encouraged? In addition Fife Council does not appreciate the need of many people, particularly the elderly, to travel by car.

Response:

Cycling and walking are encouraged by the provision of suitable facilities which will be provided via the Core Path Plan, and are supported by the Structure Plan. Transport issues are more fully addressed through the Local Transport Strategy and Area Transport Plans.

Action:

No Change

Comment No: 21

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Support the restoration of the rail link to St Andrews.

Response:

Support noted.

Action:

No Change

Comment No: 22

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Leisure Facilities

Comment:

Re: Draft Plan Policy E4 Hotel and Commercial Leisure Development. "Proposals for new hotels will be supported where they are consistent with the Strategy". What strategy is being referred to?

Response:

Draft Plan Policy E4 has been deleted from the Finalised Structure Plan but will be subsumed by Local Plans. The strategy referred to was that of the Structure Plan.

Action:

Draft Plan Policy E4 will be subsumed by Local Plans.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Re: Policy R3 of Draft Plan. Does not support the development of commercial wind farms.

Response:

Opposition to wind turbines noted. Fife Council is seeking to provide guidance that would ensure any wind energy development had minimum impact on the landscape. Draft Plan Policy R3 now Finalised Plan Policy R1.

Action:

No Change

Comment No: 24

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Waste Management

Comment:

Re: Policy W1 Waste Management Facilities. Incongruous to talk about new waste management facilitates when household waste is only going to be collected once every fortnight.

Response:

Noted. It is anticipated that increased rates of recycling and composting of domestic waste will reduce volume of household waste and the need for weekly collection.

Action:

No Change

Comment No: 25

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Paragraph 4.27 "the Local Plan will set out the concept for the extent to which St Andrews should grow over the next twenty years". What will be left of St Andrews after twenty years of exploitation? Strongly disagrees with omission of golf courses from Green Belt. Concerned that development of golf course hotels and ancillary buildings will be allowed within the Green Belt. Many Structure Plan proposals are likely to destroy St Andrews and its landscape setting.

Response:

The area for development will be identified and the Green Belt area will be capable of being strongly defended. The Draft St Andrews and East Fife Local Plan contains policies in the Green Belt on development.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Re: Policy SS1 "coalescence with adjacent settlements" Concerned that Strathkinness will coalesce with St Andrews given new development proposals.

Response:

The detailed development areas set out in the Area Local Plan together with Green Belt area will prevent St Andrews coalescing with Strathkinness.

Action:

Nimmo, Irene - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Opposes scale of development proposed for St Andrews. Suggests that new housing should be provided in land near to St Andrews to alleviate traffic and congestion, as an alternative to building more housing in the town. A dedicated retirement village with associated facilities and transport to St Andrews would free up more large houses for families within the town.

Response:

Opposition noted. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Would support provision of a new secondary school near to the Tay Bridge.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Supports reinstatement of a rail link to St Andrews.

Response:

Support noted.

Action:

Field, Elizabeth Ann - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Plans for medium scale growth in St Andrews raise serious issues such as employment, education provision, and the increase in houses in multiple occupation. Over-development will cause St Andrews to decline as a tourist centre.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. The new development is planned for the edges of the town which would not result in over-development.

Action:

Donaldson, Caroline - Dundee

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Supports seeking 45% affordable housing for St Andrews but has reservations over delivery.

Response:

The percentage requirement for the St Andrews housing market area has been revised to 30% in the light of PAN 74, the updated Housing Needs and Affordability Study and the public consultation. The planning system can make a contribution to meeting the need for affordable housing but cannot meet it in entirety. This is a commonly accepted approach and is supported by the Scottish Executive.

Action:

Change percentage requirements in Finalised Plan Policy H4 (Draft Plan Policy H5).

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

In favour of some expansion to St Andrews but development proposed in the Plan is too large. Concerned that the setting of the town will be ruined through the proposed Green Belt boundaries allowing for extensive development. The scale of development proposed for Guardbridge and Leuchars will also add further pressure on already stretched local services.

Response:

Note support for limited growth of St Andrews. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. The landscape issues have been fully considered as part of the process of delineating the St Andrews Green Belt boundary. It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Affordable homes should also be maintained in perpetuity.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Suggests exploring other options such as the House Stake Scheme or projects such as those implemented in the Lake District and Cumbria where people are entitled to buy a house only if they were born, brought up or work in the area.

Response:

Comments noted. Fife Council is already actively pursuing a range of other options such as the Home Stake scheme. The Implementation Guide on Affordable Housing, produced by Fife Council's Housing Service, addresses this issue which is not within the remit of land use planning. This Guide does afford priority to applicants with a local connection but not exclusively so. Provision must be made for incoming workers for example.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Fife Council should seek further funding from Communities Scotland for affordable housing, as understand none of the money allocated to Fife Council will be spent in St Andrews.

Response:

Communities Scotland is aware of the identified shortages in the St Andrews area and this will be emphasised by the Structure Plan. Consequently several developments have been financed in the area in the last few years. Recent projects in the St Andrews area amount to £5 million investment from Communities Scotland. Fife Council and Communities Scotland are constantly reviewing land availability in the St Andrews area and funding has been provided to Kingdom Housing Association to identify future opportunities for housing.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Current affordable housing in St Andrews is not "affordable" in relation to average earnings.

Response:

Presumably this comment relates to low cost housing for sale, which is only one type of affordable housing. Where this tenure is being considered, affordability will be determined by the results of the Housing Needs and Affordability Study. Target house prices are set out in the Implementation Guide on Affordable Housing.

Action:

Anderson, William B - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Oppose the Structure Plan proposals for St Andrews. These will exacerbate existing traffic problems and put further pressure on schooling at Madras College.

Response:

Opposition noted. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Riddell, Joan - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Objects to proposals for further growth of St Andrews. The town has reached its capacity in terms of infrastructure, transport, and service provision. A new health care facility and secondary school are required rather than an increased population.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. It is intended that all necessary infrastructure and services, including school places will be provided timeously.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Proposals for St Andrews Green Belt do not reflect the views of the Community Council or the people of St Andrews. Opposes further development around the edge of St Andrews. The University should provide more accommodation for its students, which would free up accommodation for local people.

Response:

Opposition to Green Belt proposed noted. Planning positively for future development will ensure that only planned growth is provided for and the Green Belt will be capable of being strongly defended.

Action:

Clements, Tony - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Draft Plan's case for "building the economy" through increased housing is flawed, especially re St Andrews. Data, estimates and assumptions are neither explicit nor the only ones that could be used, especially in relation to housing.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. It is considered that St Andrews has the potential to play a vital role in encouraging new employment opportunities. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Housing proposals would irrevocably destroy the landscape setting and historic centre of St Andrews.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Need for affordable housing clear however detail surrounding proposals debatable. Unrealistic to expect developers to provide 45% affordable housing as well as other contributions to infrastructure.

Response:

Support in principle noted. The Finalised Structure Plan and Supplementary Guidance will be modified in the light of PAN 74, the updated Housing Needs and Affordability Study and the public consultation. Percentage requirement for the St Andrews Housing Market Area has been revised to 30%. Draft Plan Policy H5 now Finalised Plan Policy H4

Action:

Change percentage requirements in Finalised Plan Policy H4 (Draft Plan Policy H5).

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Sensible development of the University is supported, but reservations with the approach adopted in the Structure Plan.

Response:

Support and reservation noted.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

More people in St Andrews will not create employment. It will become even more a commuter settlement, contributing to more traffic congestion in contradiction of Fife Council's stated environmental objectives.

Response:

Disagree. Housing need figures calculated by Fife Council using Scottish Executive specified methods. It is considered that there is scope for St Andrews to play a vital role in encouraging new employment opportunities. The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Doubts the consultation exercise could be meaningful - volume of documents, difficulty of accessing on the internet, time limit to digest, not all available, Local Plan produced simultaneously with the Structure Plan. LP had to follow SP provisions.

Response:

The Consultative Draft Structure Plan was in the public domain from late November 2004 onwards. The public consultation period was in excess of the statutory period and this was further extended to take account of comments submitted well beyond the closing date. It was considered helpful to publish the Structure Plan and Local Plan at the same time. However, your comments are noted. The consultation process is under review to improve consultation in the future. In view of the concerns expressed about the timescale for consultation comments were accepted for some time after the official closing date.

Action:

Review consultation process.

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Total dishonesty to pretend scale of development proposed for St Andrews would not destroy the landscape setting for ever. Green Belt boundaries are not accepted.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. The detailed Green Belt boundary is an issue dealt with in the Area Local Plan. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Population figures for St Andrews are varied making the premise on which accurate predictions of future development requirements flawed. Average household size figures used are also questioned.

Response:

Housing need figures calculated by Fife Council by Fife Council using Scottish Executive specified methods . Population data obtained from published official sources.

Action:

No Change

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Suggests smaller-scale development could have less adverse impact on landscape setting. The scale of development proposed would bring major infrastructure provision problems.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town. The delineation of development areas in the draft Area Local lan has taken full account of the landscape and other service issues.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Accepts need for affordable housing in principle, provided retained as affordable and for local people. What are the "other" mechanisms? Para 3.41 wording should be amended to include "will" and "seek to" should be deleted.

Response:

Support in principle noted. Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing. The issue of client groups is not a strategic land use planning issue. However, it is addressed in the Implementation Guide for Affordable Housing produced by the Council's housing service. This includes applicants with a local connection. Proposed changes to Para 3.41 wording accepted.

Action:

Amend Para 3.41. *Comment No:* 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Proposed expansion of St Andrews will further adversely affect infrastructure and service provision within the town, particularly education, water and drainage.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

No Change

Comment No: 14

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

St Andrews is already "World Class" and does not need treatment. Structure Plan hints that the influence of the World Class Project has been seen in the 'improvement' of South Street. Status and accountability of "World Class" organisation is not clear.

Response:

There is always scope for improvement to increase the attractiveness for both residents and visitors. St Andrews World Class organisation areas established by interested parties in St Andrews.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Concerned that proposals will result in the "Disneyfication" of St Andrews.

Response:

Concerns noted.

Action:

No Change

Comment No: 17

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Questions what is "affordable".

Response:

A broad definition of affordable housing is contained in the glossaries of both the Draft Structure Plan and Supplementary Guidance on Affordable Housing. This is quite consistent with the definition used by the Scottish Executive. In terms of low cost housing for sale, this is set out in the Implementation Guide for affordable housing being based on the updated Housing Needs and Affordability Study.

Action:

No Change

Comment No: 18

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

How would affordable housing be funded - through simply Planning Gain?

Response:

Funding could come from a variety of sources: Communities Scotland, housing associations, Fife Council (in the form of surplus Council owned land) and from reduced land values. Provision through the planning system would be in the form of a requirement set out in the Development Plan and not through Planning Gain as such.

Action:

No change

Waterston, Robin - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Objects to the Structure Plan proposals for St Andrews, which propose too much new housing, especially on the southern hillside. There should be no major expansion of St Andrews.

Response:

Objection noted. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Built Environment

Comment:

Need for clear protection against high buildings in the Conservation Area.

Response:

This is an issue for Policy Guidance contained in Local Plans. Any proposals would be evaluated taking account of Design Quality (Draft Plan Policy ENV3). The Urban Design Guide provides advice on the Council's expectations of quality design within the context of the National Planning framework. Draft Plan Policy ENV3 will be included in Area Local Plans.

Action:

Draft Plan Policy ENV3 will be included in Area Local Plans.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Re: Draft Plan Policy H5 Affordable Housing. How can long term affordability be ensured?

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing. Appropriate reference is made to this approach in Policy H4 (was Policy H5).

Action:

Draft Plan Policy H5 now Finalised Plan Policy H4

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

High priority for a light rail link from St Andrews to Leuchars.

Response:

Support noted. Proposal PT1 of the Finalised Structure Plan (Draft Plan Proposal PT2) lists the key strategic transport proposals for the Plan period, with further consideration of transport link options for St Andrews to the rail network to be addressed through the review of the Local Transport Strategy.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

What has been done to ensure that the University provides more residences for students?

Response:

This is not a strategic land use planning issue and as such is more properly addressed by the St Andrews and East Fife Local Plan. Comment will be considered in that context. The University is aware however, of the shortage of affordable housing.

Action:

MacGregor, James W E - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Policy ENV1 is a weak statement which reflects Fife Council's countryside policy and not the Scottish Executive's Green Belt Policy.

Response:

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which also identify the boundaries.

Action:

Policy and text amended.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Reference to Draft Plan Schedule H3? Why does St Andrews need so much new housing?

Response:

Housing need figures for St Andrews calculated by Fife Council using Scottish Executive approved methods. The methodology used is set out in the Report of Survey accompanying the Structure Plan. Strategic Housing allocations set out in Finalised Plan Proposal H2.

Action:

Housing allocation for St Andrews reduced form 1,00-1,800 to 1,200 in Finalised Plan.

Roger, Jo - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

There is no justification for further expansion of St Andrews, beyond extra low cost housing. Any expansion would destroy the town's character.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Stop sale of shared ownership or Council housing stock.

Response:

This is not a strategic land use planning issue. However the Council has submitted an application for suspension of the right-to-buy in pressured areas of Fife.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Houses in Multiple Occupancy

Comment:

Limit the number of houses in multiple occupation. The University should be forced to provide more residential places of which some should be self catering facilities.

Response:

Noted. It is acknowledged that this is an important local issue. However as the Structure Plan is a strategic document, this matter is more appropriately addressed by the Local Plan process, especially the St Andrews and East Fife Local Plan. The University cannot be required to provide student accommodation. The Council is, however, liaising with the University.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

The consultation documents are too bulky and complex. Presentations at St Andrews public meeting were too wordy and complex.

Response:

The Consultative Draft Structure Plan was in the public domain from late November 2004 onwards. It was considered helpful to publish the Structure Plan and Local Plan at the same time. Comments are noted. The consultation process is under review to improve consultation in the future. Difficult to strike a balance as many consultees expressed the view that the meetings provided insufficient detail.

Action:

Review consultation process.

Lindsey, John

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Object to further development proposed for St Andrews. This would increase traffic problems and exacerbate need for another secondary school. Not enough thought given to reinstating the rail link.

Response:

Objection noted. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. Proposals for rail link mentioned in Finalised Plan Proposal PT1. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Hopgood, A M - Blebo Craigs, Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Development that is proposed is in conflict with the implied protection of the landscape setting proposed in the 1996 Tyldesley report and the findings of the 2003 Landscape Capacity Assessment for St Andrews. Scale of development proposed cannot be accommodated without seriously damaging its landscape setting and shows a lack of commitment to the St Andrews Green Belt. The Structure Plan should retain Policy SS8 from the 2002 Structure Plan, with its proposed Green Belt encircling the town.

Response:

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries.

Action:

Policy and text amended.

Donaldson, Valerie - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Not in favour of the development of the proposals for St Andrews. Local services could not cope with another 1800 houses. Any new build should be at an affordable level and sold only to those who were born, brought up or work in St Andrews.

Response:

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which also identify the boundaries. Current policy is similar to policy in Fife Structure Plan 2002.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

What has happened to our Green Belt and those who were in favour of it in 2002?

Response:

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries.

Action:

Policy and text amended.

Willsher, E C - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Supports restoration of a rail link from Leuchars to St Andrews. Proposed route should be protected from development. Supports implementation of a regular bus link between St Andrews and Leuchars.

Response:

Support noted. Finalised Plan Proposal PT1 and Policy T2 address the issue of protecting routes which will be identified in detail in the Area Local Plan.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Why does St Andrews need this extra housing development? How will infrastructure such as education, health care, water and drainage and retail cope with further growth?

Response:

Housing need figures for St Andrews calculated by Fife Council using Scottish Executive approved methods. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Support for affordable housing development and its retention as affordable in perpetuity.

Response:

Support in principle noted. Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Green Belt proposals do not implement the 2002 Structure Plan, which was acceptable to the Executive and to the people of St Andrews. Proposals allow too much development within Green Belt boundaries. Why is the land along the coast not protected? Why are golf courses not included in the Green Belt?

Response:

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which also identify the boundaries. The detailed boundary of the Green Belt is shown on the draft St Andrews and East Fife Local Plan. It has been delineated to provide for development need and this boundary will be defensible in the long term.

Action:

Policy and text amended.

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Why is provision of affordable housing tied to delivery of mainstream housing development?

Response:

The scale of the affordable housing shortfall in Fife is such that Communities Scotland investment is unable to address it in entirety. In such situations, the planning system can make a contribution through the delivery of mainstream housing. Fife Council is, however, also progressing a number of other initiatives to facilitate affordable housing.

Action:

Christie, Vicky - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Concerned that most points raised at St Andrews public meeting, although valid, were put by Councillors or MSPs rather than members of the public.

Response:

Concerns noted, however the chair had a limited amount of time for the formal part of the meeting. The informal session provided the opportunity to pose questions to Fife Council staff members.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Concerned that previous Green Belt studies are ignored and the proposed boundaries allow for too much growth.

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements. The detailed boundary of the Green Belt is shown on the draft St Andrews and East Fife Local Plan. It has been delineated to provide for development needs and this boundary will be defensible in the long term.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Accepts need for affordable housing, but this should be retained as affordable.

Response:

Support in principle noted. Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

A new secondary school in the St Andrews and East Fife area is a top priority.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

Kinloch, - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Public meeting at St Andrews did not give answers to the questions raised. Feel that all Development Plans have already been finalised.

Response:

The presentations could not, in the timescale, go into detail. It is considered that the questions were answered honestly and directly. Those who did not have time to attend the meeting had the opportunity to raise questions with officials. Officials were available prior to the meeting to discuss proposals. Account is taken of comments and changes made where appropriate.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

St Andrews is being exploited by over development. Priority should be given to the provision of a new hospital, school at the Tay Bridgehead and a viable plan for affordable housing. Any development should be sympathetic to the town's character and heritage and protect its landscape setting.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. Affordable housing is addressed via Finalised Plan Policy H4 (Draft Plan Policies H5 and H6). St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action

Boyd, Deirdre - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Strong support for the comments made by the St Andrews Preservation Trust, particularly in relation to Green Belt boundaries. The boundaries suggested are a compromise which fail to protect the character of St Andrews.

Response:

Support noted. The detailed boundary of the Green Belt is shown on the draft St Andrews and East Fife Local Plan. It has been delineated to provide for development needs and this boundary will be defensible in the long term.

Action:

St Andrews Bay, Carter, Stephen - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Tourism

Comment:

Supports the intention to develop St Andrews as a World Class Destination and to build on the tourism industry in Fife as part of the strategy to grow Fife's economy.

Response:

Support noted. However, Draft Plan Policy E4 has been deleted from the Finalised Structure Plan but will be subsumed by Local Plans. The Finalised Structure Plan contains several references to hotels and tourism. Additional wording has been added to Finalised Plan Policy E1.

Action:

Add text to Finalised Plan Policy E1 to promote hotel development. Draft Plan Policy E4 has been deleted from the Finalised Structure Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

Support the recognition of the need to further capitalise on the golf and leisure economy of East Fife (paragraph 3.11) and the adoption of St Andrews World Class as a key economic driver (paragraph 3.13). Also support the recognition that tourism is a significant driver of the St Andrews economy (paragraph 3.16).

Response:

Support noted.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Leisure Facilities

Comment:

Supports the recognition that Fife is in the right location and has the right assets to take a lead in the growth of leisure business in Scotland and welcomes support for hotel and commercial leisure development (Draft Plan Policy E4).

Response:

Support noted. However Draft Plan Policy E4 has been deleted from the Finalised Structure Plan but will be subsumed by Local Plans. The Finalised Structure Plan contains several references to hotels and tourism. Additional wording has been added to Finalised Plan Policy E1.

Action:

Add text to Finalised Plan Policy E1 to promote hotel development. Draft Plan Policy E4 will be subsumed by Local Plans.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Supportive of the recognition for the need for enhanced national and international connectivity.

Response:

Support noted.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Design Quality

Comment:

Support Draft Plan Policy ENV3 and the promotion of high quality design.

Response:

Draft Plan Policy ENV3 will be included in Area Local Plans.

Action:

Draft Plan Policy ENV3 will be included in Area Local Plans.

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Natural Environment

Comment:

Support for Policy ENV6 of Draft Plan, Nature Conservation Enhancement and recognition of opportunity for new woodland to help integrate new development into the landscape (paragraph 4.41 of Draft Plan). Also support for development in the countryside to be of a high quality in terms of siting design and use of materials, taking account of the character of the landscape.

Response:

Support noted. Policy ENV6 of Draft Plan is now Policy ENV4 of Finalised Plan.

Action:

Wilson, E A - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Developer lead provision of affordable housing is unacceptable as it rarely allows further housing development and houses provided are only affordable on a one off basis.

Response:

Disagree. The provision of affordable housing through the planning system is a legitimate means of contributing to meeting for affordable housing. This is supported by Scottish Executive's planning policy. Many other Local Authorities across Britain are using this approach. Retention of affordable housing is however a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Water and Drainage

Comment:

Water and drainage in St Andrews are inadequate at present and further expansion should only be allowed when the systems have been upgraded.

Response:

The Finalised Structure Plan seeks the timely provision of appropriate infrastructure in support of new development, as detailed in Policy DC1 and Proposal DC1. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. The Area Local Plan and masterplan will ensure that development is integrated and phased, and that appropriate infrastructure is delivered.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Fife Council should not be proposing further development for St Andrews. It should make greater effort to protect its landscape and heritage.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Fife Council should explore suitable alternatives such as obtaining Pressured Area Status and the use of Housing Associations.

Response:

Fife Council is progressing a number of other approaches to providing affordable housing. These include progressing Pressured Area Status for the areas with the most pressing need, reduction of Council Tax discount on second homes and use of surplus Council owned land. Reference to a range of additional measures that the Council is pursuing has been inserted into the supporting text. Housing Associations are already involved through Communities Scotland investment programmes.

Action:

Insert text to outline additional measures being taken.

Ledder, J - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Concerned that Fife Council officials at St Andrews public meeting could not, or would not, answer the questions from the floor.

Response:

The answers given at the meeting were an honest response, however, many of the questioners were unhappy with the answers given.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Do not support further development in St Andrews and therefore object to the whole Structure Plan.

Response:

Objection noted. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Bullough, Alice

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Support for comments submitted by the St Andrews Preservation Trust.

Response:

Support noted.

Action:

Lydvo, J Sheila - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Structure Plan seeks to develop St Andrews as a World Class destination for tourists but fails to address the needs of residents. The world class destination needs world class infrastructure in place before new homes are built and the population increased. The community is becoming dominated by the University and student population to the exclusion of young families.

Response:

It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned. Growing the population and providing affordable housing should help to redress perceived population imbalance.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Why is Fife Council seeking to grow Fife's population in the face of a decreasing Scottish population?

Response:

The Council is currently undertaking a report looking at demographic change in Fife over the Structure Plan period. This report will reinforce the justification for the policy assumptions on population growth and provide further information to support the strategy.

While the 2002 based population projections for Scotland show decline nationally, at a sub regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

Councils such as West Lothian, East Lothian and Stirling are all projected by the GRO (General Register Office for Scotland) to have population growth over 9% in the period up to 2018.

Fife is now coming under the influence of the Edinburgh City Region. Between 2000 and 2004 the population of Fife has grown by over 6,000. This level of growth easily meets the 5% aspirational population target set for Fife over a twenty year period. Recently published 2004 based population projections show Fife growing by 9.1% over the next twenty years.

Action:

Demographics work has been updated, the details of which are contained in the Report of Survey.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

With its increased student numbers, it is time for the University to invest in its own health centre. The present situation places an unacceptable strain on existing services, as does the lack of a decision as to where and when St Andrews will get its new hospital.

Response:

The provision of new and additional health care facilities is a matter for NHS Fife, which is aware of the proposals for growing Fife's population 2006-2026.

Action:

Cubbage, George - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Objects to Draft Structure Plan as not enough time has been given for a public consultation. No case has been put forward to change the agreed 2002 Structure Plan.

Response:

The Consultative Draft Structure Plan was in the pubic domain from late November 2004. The public consultation period was in excess of the statutory requirement and this was further extended to take account of comments submitted well beyond the closing date. Proposal PM2 in the approved Fife Structure Plan 2002 made commitment to reviewing Structure Plan prior to 2006.

Action:

Finlay, Janet - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Why is the Structure Plan seeking to grow Fife's population by as much as 5%?

Response:

Fife Council seeks to take a pro-active approach to addressing the Fife economy and increasing the population is seen as having a vital part to play in implementing the Plan.

Action:

Demographics work has been updated, the details of which are contained in the Report of Survey.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

A population increase of 5% in St Andrews would represent an additional population of 500 people. Why then does the Structure Plan propose an additional 1800 houses which would result in a possible population increase of between 3600 to 5400 people?

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. Housing need figures for St Andrews calculated by Fife Council using Scottish Executive approved methods.

Action:

The housing allocation in the finalised plan is 1,200 houses for St Andrews over the next 20 years.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Support a high percentage of affordable housing but the legislation must be in place to retain these houses as affordable.

Response:

Support in principle noted. Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

1998 Strategic Study for St Andrews states that "St Andrews is at its landscape capacity and no major expansion should take place". What has changed since 1998?

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

Action:

The housing allocation in the finalised plan is 1,200 houses for St Andrews over the next 20 years.

Hirst, D - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Fully support provision of affordable housing in St Andrews area but this can be achieved without the need for excessive development led intrusion into green field sites.

Response:

Given the scale of the identified affordable housing shortage in the St Andrews housing market area, not all of this can be provided on brownfield land. Greenfield land release will be required. However, the Council's priority is to use brownfield land in preference to greenfield land.

Action:

No change.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Houses in Multiple Occupancy

Comment:

University of St Andrews should be encouraged to use their own land to provide student accommodation, thus reducing the increasing level of houses in multiple occupancy. This would release further properties onto the housing market and reduce the number of council tax exemptions.

Response:

Fife Council has no powers to require the University of St Andrews to provide student accommodation, nor can the University require any student to use any such accommodation provided. However, the Council is liaising with the University. It is acknowledged that houses in multiple occupation is an important local issue. However as the Structure Plan is a strategic document, this matter is more appropriately addressed by the Local Plan process, especially the St Andrews and East Fife Local Plan. The issue of Council Tax is not a land use planning matter.

Action:

Samuel, Vanessa

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Object to proposed development of 1850 new homes in St Andrews as the need for these is uncertain.

Response:

Objection noted. Housing need figures for St Andrews calculated by Fife Council using Scottish Executive approved methods.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Structure Plan and Local Plan will not deliver affordable housing that will remain affordable in perpetuity.

Response:

Retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Too many plans to be considered in such a short consultation period.

Response:

The Consultative Draft Structure Plan was in the public domain from late November 2004. The public consultation period was in excess of the statutory requirement and this was further extended to take account of comments submitted beyond the closing date.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Fife Matters does not deliver an effective Green Belt around St Andrews as outlined in the 2002 Structure Plan.

Response:

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries.

Action:

Policy and text amended.

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

Terms "St Andrews World Class" and "economic driver" are not precise and do not clarify the reasons for further development in St Andrews.

Response:

St Andrews World Class is a partnership of local businesses and public agencies including Fife Council, and includes representatives of St Andrews Community Council, St Andrews Preservation Trust and St Andrews Merchant Association. It figures prominently as St Andrews is identified as a key centre in Fife. There is local input via Fife Council and the other local bodies. Economic driver in this context means a location which can assist in the creation of new employment opportunities.

Action:

Taylor, - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Affordable housing should not be developer led as developers will seek to reduce the percentage of affordable houses that build to a minimum in order to maximise profits. Housing Associations and Council funding to provide affordable housing should be used.

Response:

The scale of the affordable housing shortfall in Fife is such that Communities Scotland investment is unable to address it in entirety. In such situations, the planning system can make a contribution through the delivery of mainstream housing. Fife Council is, however, also progressing a number of other initiatives to facilitate affordable housing.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Affordable housing should be affordable in perpetuity.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

There is concern that St Andrews is the focus of property speculators who build large number of houses for conversion to houses in multiple occupancy and this should not be allowed to happen. Retired people are being priced out by the town by speculators. Concerned that if 1850 houses are built then a large number would be bought up for renting and the ability to build a sustainable community would be lost.

Response:

Concerns noted. It is intended that the new housing will have an affordable element to assist in making the town a more sustainable settlement. It is unlikely that a significant number of houses will be purchased for rent.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Object to the number of documents that have emerged during this short public consultation as 675 pages of information is an enormous amount of information to study.

Response:

The Consultative Draft Structure Plan was in the pubic domain from late November 2004. The public consultation period was in excess of the statutory requirement and this was further extended to take account of comments submitted well beyond the closing date. Proposal PM2 in the approved Fife Structure Plan 2002 made commitment to reviewing Structure Plan prior to 2006.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

Whilst much has been written about affordable housing and St Andrews World Class neither have been clearly defined within Fife Matters.

Response:

Affordable housing is explained in the Glossary and St Andrews World Class is a partnership of local businesses and public agencies including Fife Council, and includes representatives of St Andrews Community Council, St Andrews Preservation Trust and St Andrews Merchant Association.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The plan for medium scale growth for St Andrews, to ensure the continued development of the University and the golf tourism sector would, in our opinion, do irreparable damage to the unique attributes of St Andrews namely: a) a loss of the unique landscape approaches to St Andrews and b) the loss of a huge area of Green Belt.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. It is considered that St Andrews has the potential to play a vital role in encouraging new employment opportunities.

Action:

Changes to the housing allocations across Fife were considered and are reflected in the finalised Structure Plan at Proposal H2.

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The construction of 1850 new houses in St Andrews would result in an increase in traffic chaos in the town centre.

Response:

The issue of traffic congestion will be addressed via the Local Transport Strategy and Area Transport Plan.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is considered that the 1850 new homes are not required to support any growth in the University and golf sectors as student numbers are unlikely to grow and the scale of growth in the science park sector is unlikely to be as large as suggested. A major development by a single developer could cause irreparable damage to the setting of St Andrews.

Response:

The scope to secure additional employment via a science park in St Andrews cannot be ignored in view of the University of St Andrews research and development potential. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Do not support the proposals for St Andrews to be seen as the key to the growth of the Fife economy as it is already a key economic factor for Fife. Cupar would be a better centre for expansion as it has a demography excellent transport connections which would allow this. Given the excellent links between St Andrews and Cupar, Cupar could provide additional housing for any growth in those working in St Andrews.

Response:

St Andrews' potential for creating new employment opportunities cannot be ignored. Whilst there is scope to further extend Cupar, to view the town as a dormitory for St Andrews is unsustainable.

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Housing Association and Council funded build should be used in preference.

Response:

The Council's preference is for social rented housing but the scale and type of the need is such that other tenures will also be required. Current Fife Council policy is not to build Council housing, due to right-to-buy legislation, but this may be reviewed in due course.

Action:

Wood, Chris - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Concerned about the public meeting at St Andrews. Fife Council's presentation was not very helpful as it did not even show a map of the proposed housing locations or the proposed Green Belt. Attendees were left to walk around many displays trying to piece together what Fife Council is seeking to do. Also concerned that a number of questions raised by members of the public at the meeting were not answered.

Response:

The presentations could not, in the time scale, go into detail. The questions were answered honestly and directly. Those who did not have time to attend the meeting had the opportunity to raise questions with officials. Officials were available prior to and after the meeting to discuss proposals. All the comments made are carefully considered but will not always result in a change to the plan. The consultation process is under review to improve consultations in the future.

Action:

Review consultation process.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Concerned that Fife Council released six documents for public consultation at the same time. These documents are complex, interrelated and often confusing totalling the sum 675 pages. Also concerned the documents Fife Council refer to the town of St Andrews, St Andrews locality and the St Andrews Housing Market Area without clear explanation or maps of each. This is very confusing and not acceptable if Fife Council is truly interested in an effective consultation.

Response:

The Consultative Draft Structure Plan was in the pubic domain from late November 2004. The public consultation period was in excess of the statutory requirement and this was further extended to take account of comments submitted well beyond the closing date. Proposal PM2 in the approved Fife Structure Plan 2002 made commitment to reviewing Structure Plan prior to 2006. It was considered helpful to publish the Structure Plan and other documents at the same time. Comments are noted. The consultation process is under review to improve consultation in the future. Concerns about a perceived lack of clarity of areas referred to in text noted.

Action:

Review consultation process. Review text in Structure Plan and Report of Survey for clarity.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Concerned abut being asked to comment on very important long-term plans for Fife based on incomplete information. Appreciate the difficulty in ensuring studies are completed timeously, however specifically in the case of St Andrews two crucial documents are missing i.e. the School Estate Strategy and the Kinness Burn Drainage Study. 2000 new homes over 20 years will affect both schools and the drainage systems which already have capacity problems in the St Andrews area.

Response:

The information is contained in published documents, especially the Report of Survey, which was available for inspection. Note concerns about lack of other documents but Fife Council is committed to ensuring that services such as school places will be available timeously where development is committed and this is addressed in the Policy DC1. Other infrastructure will also be provided and flooding must be addressed on the basis of 1 in 200 year return events.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Applaud Fife Council's attempt to look at Fife in a holistic and interconnected manner but concerned that there is no indication as to how the stated goals are to be achieved. Concern that:
a) simply building employment facilities will not mean companies coming to Fife which has a lower than national average new business start up rate; b) Simply building affordable housing does not mean they will genuinely solve a serious problem affordability as they must remain affordable in the long term c) most of the wealth created by this Plan will pass to developers and to Fife Council through increased taxes.

Response:

Support and concerns noted. It is agreed that a range of inter-related activities require to achieve improved economic growth, however the land use element of the Structure Plan cannot be ignored. Fife Council is working towards addressing long-term retention of affordable housing. Finalised Plan seeks to ensure that everyone will benefit from new developments.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Note the contents of paragraph 110 with regards to location of proposed new employment creating development but fail to see how the proposed development in St Andrews will create employment for anyone but the developers.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Applaud Fife Council for seeking major planning gain from developers. However it is doubted that Fife Council can be impartial and choose what might be the best for the citizens of any town because it is under extreme pressure to finance infrastructure provision and upgrades through developers. In addition any negotiations about the final placement of new housing and resulting planning gain will take place out of public view and without their input.

Response:

The issue of the development of areas identified in the Structure Plan will be pursued via Area Local Plan, Master Plan and development brief process, all of which would be undertaken after consultation with the public and other interested parties.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Re: Draft Plan paragraph 1.4, Fife Council deceptively refers to the medium scale growth in St Andrews based on an arbitrary definition of not having more than 1000 homes on any single development site. The proposed 1850 new homes, which would be occupied by 1.9 persons means that Fife Council is actually seeking to increase the town's population by 37% in the next 20 years. This increase would make St Andrews the fastest growing town in Fife and cannot therefore be considered to be medium scale development.

Response:

The definition of the scale of development of housing in absolute, rather than, percentage terms is used considerably throughout the Plan. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. Allocations to St Andrews has been reduced from 1,000 - 1,800 in the Draft Plan to 1,200 in the Finalised Plan.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

The development of land owned by a consortium including the University will provide funding only for potential future University buildings. Whilst reasonable expansion of the University is supported, this support does not extend to any destruction of the landscape setting of St Andrews as the only option the University possesses. There are other options for reasonable expansion of the University, even if they are not the first choice of the University Court.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. The only income generated by the University would be delivered through the sale of its assets to facilitate new development.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

With regard to Draft Plan paragraph 1.14, any additional housing in St Andrews would be bought by retirees, by rich tourists as seconds homes or commuters to Dundee or Edinburgh. In the latter case such extensive travel is in direct contravention of Fife Council's environmental policy.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

With regard to Draft Plan paragraph 1.14, the proposals will not help address the affordable housing shortage in the town in the long term. A few people may get lucky once then these homes may cease to be retained as affordable and the land and opportunity will be squandered.

Response:

Retention of affordable is a very important issue. Where the tenure is low cost home ownership, the Council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Supplementary Guidance and Finalised Structure Plan

Action:

No Change

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

With regard to Draft Plan paragraph 1.16, concerned that the proposal to develop St Andrews as a World Class tourist destination means that Fife Council is focusing solely on the rich end of the market to the detriment of the town and other tourists. St Andrews needs to attract the spectrum of tourists and consequently needs a range of services from five star hotels to caravan parks. Some of these may not be world class.

Response:

Disagree that St Andrews becoming a world class tourist destination would be detrimental to the town as most areas can benefit from improvement and to be a detriment a whole range of potential tourists who might visit the town.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Draft Plan paragraphs 1.17 and 1.18 emphasise the importance of connectivity. The proposals for St Andrews have put things back to front as any new housing built in St Andrews will not be bought by residents who work in the town and will be occupied by commuters to Dundee and Edinburgh.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. It is considered that St Andrews has the potential to generate new employment opportunities reducing the likelihood of it becoming more a base for consumers.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 13

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Draft Plan paragraph 1.21 of the Plan states that Fife Council will work in partnership with University of St Andrews to develop a campus plan through the Local Plan. This is not referred to anywhere in the Draft Local Plan nor is there any explanation of what the campus will be.

Response:

The reference in this context relates to the Local Plan as the mechanism for taking forward the development of any campus. Local Plans are revised every five years, so there is the opportunity for the issue to be addressed in subsequent plans.

Action:

No Change

Comment No: 14

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Draft Plan paragraph 1.21 refers to encouraging developers to use local labour and provide training and skills development/programmes to expand the skill workforce. Whilst this sounds good there is no indication as to how this will be enforced.

Response:

In a number of instances planning agreements have addressed the source of the labour force.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Applaud and support Fife Council for recognising affordable housing as one of its most significant issues confronting Fife and that regardless of the scale of expansion it is essential a balanced mixed community is achieved.

Response:

Support noted. It is agreed that a balanced and mixed community is important ad the Plan aims to achieve this.

Action:

No Change

Comment No: 16

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

The Vision for Fife in 2026 is overly optimistic as it does acknowledge the flight of manufacturing from Fife. Fife Council should look at the United States and the revolution offered by the knowledge economy in high speed internet connection has not been as radical as first anticipated.

Response:

The Vision looks to the future of Fife rather than the status quo. Whilst important, the knowledge economy is not the only potential mechanism to achieve new employment opportunities.

Action:

No Change

Comment No: 17

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Draft Plan paragraph 2.7 sounds good in theory but really has little substance. It is considered that Fife Council should be capitalising on the unique features of the intimate medieval town and the small shops which are attractive to visitors.

Response:

Concerns noted. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. St Andrews has the potential to play a vital role in encouraging new employment opportunities.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Questions whether the proposed development of St Andrews, which would result in a 37% increase in population, is in line with Policy SS1 on settlement development strategy. This level of development will clearly strain the community infrastructure even with extensive developer contributions to planning gain. Clearly this level of housing development will not result in retaining and improving the landscape setting of settlements.

Response:

The definition of the scale of development of housing in absolute, rather than, percentage terms is used considerably throughout the Plan. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 19

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Support of the ideas contained in Policy DC1 but cautious about how this will be implemented. In addition it is not inconceivable that Fife Council might require the planning gain investment to service a new development whilst the community would prefer it to provide other amenities.

Response:

Support noted. The Structure Plan sets the strategic Policy approach. Detailed discussions will follow once the process has been advanced via Area Local Plans, Master Plans and development briefs. The Community has an opportunity to comment on the contents of Local Plans and Master Plans and has a further input at the time when a planning application is considered

Action:

No Change

Comment No: 20

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Disappointed that Draft Plan Policy DC2 does not list developers' requirements for St Andrews and does not appear to require affordable housing in all strategic areas.

Response:

Draft Plan Policy DC2 has been revised as Finalised Plan Proposal DC1. With regard to affordable housing requirements of Finalised Plan Policy H4 (Draft Plan H5 and H6) new figures set out in Supplementary Guidance. Developer requirements for St Andrews addressed via Area Local Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

References to St Andrews World Class in paragraph 3.13 are vague as there is no explanation of who the members of this group are nor is there any information about their goals and accountability to the people of St Andrews.

Response:

St Andrews World Class is a partnership of local businesses and public agencies led by Scottish Enterprise Fife and includes Fife Council. It includes representatives from St Andrews Community Council, St Andrews Preservation Trust and St Andrews Merchant Association. It figures prominently as St Andrews is identified as a key centre in Fife. There is local input via Fife Council and the other local bodies.

Action:

No Change

Comment No: 22

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Proposals for changes to South Street were a public relations disaster and as they failed to take account of the public's input. Had this approach been adopted many of the positive proposals may have been implemented.

Response:

Comment noted, although this issue is outwith the scope of the Structure Plan.

Action:

No Change

Comment No: 23

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Whilst agreeing and supporting paragraph 3.21 the philosophy stated in this paragraph does not match the following paragraph which is of great concern. Paragraph 3.22 refers to St Andrews being developed as a World Class destination but appears to ignore residents as the town does not need a proliferation of multiple retailers.

Response:

It is not intended that any proposals for St Andrews town centre should be achieved at the expense of local residents. St Andrews' important local role in serving residents is acknowledged.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

St Andrews does not need the proposed 1850 new homes. The 1998 Strategic study rejected major housing development in St Andrews on the basis of landscape capacity, the unacceptable impact on the quality of the town environment and the approved Structure Plan required zero new houses in St Andrews until 2011. Without new employment opportunities in the town any new houses will be purchased by commuters or retirees rather than young local people.

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan, which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period 2006-2026, which the emerging Development Plan addresses in setting the housing land requirement and allocations. Both the Structure Plan and St Andrews & East Fife Local Plan give strong support for employment growth in St Andrews. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 25

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The approach to housing in Fife Matters is very confusing and the numbers quoted are not easy to understand. In case of St Andrews there are different references to St Andrews and there is little or no explanation or justification for actions taken. For example paragraph 3.30 refers to HMAs that are based on research without providing any further information.

Response:

The Structure Plan Report of Survey gives details of the calculation of the housing land requirement and Housing Market Areas. The revised Proposal H1 shows the housing land requirement by Housing Market Area.

Action:

Revision of Proposal H1.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Schedule H1 and Schedule H3 are misleading. Schedule H1 refers to the new homes to be built in the St Andrews Housing Market Area whilst Schedule H3 states that between 1000 and 1850 new homes will be built in the town of St Andrews. There is an enormous difference between 1000 and 1850 new homes.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 27

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

With regard to paragraph 3.37, which refers to promoting sustainable development, it is questioned whether doubling the house completion rate of the last five years in St Andrews is sustainable in view of current infrastructure availability.

Response:

The housing allocation for St Andrews is intended to meet the requirement for the town for the period 2006-2026. Finalised Plan Policies DC1 and H3 (Draft Plan H4) provide support for the full consideration of infrastructure requirements prior to development commencing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

St Andrews really needs affordable housing that remains affordable, however, Fife Council's proposal of developer led marketable housing is not a real solution as these houses can quickly be sold for a large profit in the open market. The result is less land for affordable housing than before and zero gain in permanently affordable housing.

Response:

The provision of affordable housing through the planning system is a legitimate means of contributing to meeting the need for affordable housing. This is supported by the Scottish Executive's planning policy. Many other local authorities across Britain are using this approach. Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

No Change

Comment No: 29

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Alternatives to developer led provision for affordable housing exist but are not being pursued. A plan for affordable housing for local people with a right mix of rental and property for sale is required and these homes should be affordable in perpetuity.

Response:

Disagree. Fife Council is progressing a number of other approaches to providing affordable housing. These including progressing Pressured Area Status for the areas with the most pressing need, reduction of Council Tax discount on second homes and use of surplus Council owned land. Reference to a range of additional measures that the Council is pursuing has been inserted into the supporting text. Housing Associations are already involved through Communities Scotland investment programmes. The issue of priority client groups is addressed by the Implementation Guide on Affordable Housing produced by Fife Council's Housing Service. This gives priority to those with a local connection.

Action:

Insert text to outline additional measures being taken.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Fully support Fife Council's goal of 45% affordable housing in St Andrews (Policy H5) but concerned that well connected, expensive lobbing from developers will force this number down significantly. People in St Andrews deserve better and Fife Council must stick to their initial goals with minimum compromise.

Response:

Support in principle noted. However, percentage requirement has been revised to 30% as a result of the public consultation and PAN 74 which sets a benchmark of 25%. In relative terms, the St Andrews Housing Market Area (HMA) has the highest level of need of any HMA in Fife and consequently it will have the highest percentage requirement.

Action:

Change percentage requirements in Finalised Plan Policy H4 (Draft Plan Policy H5).

Comment No: 31

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Considered that the proposed increase in housing in St Andrews would not be consistent with the transportation policy objectives and in terms of paragraph 3.47. Considered that the plan development for St Andrews will result in homes either being bought by retirees, second home owners or people commuting to Dundee or Edinburgh or elsewhere which will turn St Andrews into an even more of a commuter town.

Response:

St Andrews has the potential to play a role in encouraging new opportunities, thereby reducing the number of commuters.

Action:

No Change

Comment No: 32

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Support Fife Council's attempt to provide a cycle network, however, consider that more people would use cycles if the routes were off road.

Response:

Support noted. The Core Path Plan seeks to establish new off road routes, supported by Finalised Structure Policy T2.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Waste Management

Comment:

Support Fife Council's attempt to increase recycling and decrease waste production however concern that businesses generating large amounts of waste cardboard boxes are not recycling.

Response:

Noted. This matter is more properly addressed by the Fife Area Waste Plan and Fife Council is seeking to increase the range of items collected for recycling. Comment will be considered in this context.

Action:

No Change

Comment No: 34

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

The scale of development proposed for St Andrews is inconsistent with Fife Council's stated goals in the Policy Objectives on the environment at paragraph 4.24 of Draft Plan.

Response:

The boundary of the St Andrews Green Belt as proposed has been drawn taking full account of all the natural and built environmental issues including the landscape setting.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Concerned that Fife Council has abandoned the intent of the Scottish Executive in mandating a Green Belt for St Andrews and will set the boundary of new development prior to establishing Green Belt boundaries rather than previously considered to be the case. It appears that Fife Council's primary concern clearly is not protecting the landscape setting of St Andrews as the boundary proposals contained in the Area local Plan. It is considered that Green Belt boundaries as proposed allow extensive development that would irretrievably damage the landscape setting and the medieval heritage of St Andrews. Losing green fingers into the town and green space within the town to housing would change its character.

Response:

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which also identify the boundaries. The detailed boundary of the Green Belt is shown in the draft St Andrews and East Fife Local Plan. It has been delineated to provide for development need and this boundary will be defensible in the long term.

Action:

Policy and text amended.

Comment No: 36

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Disagree that Fife Council's approach for St Andrews will achieve the aim as developer led affordable housing does not remain affordable.

Response

The planning system is a legitimate means of contributing to meeting the need for affordable housing and this is supported by the Scottish Executive. Many other local authorities across Britain are using this approach. The retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

It is considered that most of the land identified in the Draft Local Plan for development is owned by developers and therefore it is unlikely that there will be any Housing Association or other mechanisms to keep affordable housing for longer than the first purchase which is not consistent with the spirit of paragraph 3.41.

Response:

This is not a strategic planning issue and is more properly addressed by the St Andrews and East Fife Local Plan. Comment will be considered in that context.

Action:

St Andrews Preservation Trust Limited, Morrison, Dorothea - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The thinking behind the development strategy policy is flawed as it is impossible to compare a small town like St Andrews with Dunfermline, Kirkcaldy and Glenrothes. Whilst St Andrews may be able to cope with small scale, gentle growth it would be impossible for the town and its infrastructure to cope with the high level development proposed in the draft Structure Plan. In a small town its quite wrong to measure the scale of the development by site size as all development in a small town or village affects the whole area.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. The definition of the scale of development of housing in absolute, rather than, percentage terms is used considerably throughout the Plan.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The statement in paragraph 1.17 that employment land will be adjacent to housing land will be impossible to operate in St Andrews. Extra housing as proposed would simply lead to increased car travel.

Response:

The mixed use approach can be achieved via detailed planning through Area Local Plans, Master Plans and development briefs and making adequate provision for public transport to serve the areas.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Houses in Multiple Occupancy

Comment:

The housing shown in the town centre in the Local Plan has become largely houses in multiple occupancy.

Response:

Concern noted. It is acknowledged that this is an important local issue. However as the Structure Plan is a strategic document, this matter is more appropriately addressed by the Local Plan process, especially the St Andrews and East Fife Local Plan.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Paragraph 2.7 with regards to St Andrews ignores the importance of the town as a small town and as a result of this there is an unsound notion that the town needs to expand considerably and that the currently proposed Green Belt for the town makes a mockery of the principals of Green Belts. Developers will always put pressure in areas where there is a current demand but satisfying that demand is not necessarily the best answer for any area.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. The Green Belt has been delineated taking full account of current guidance. The proposals for St Andrews are not, as suggested, developer led.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

The approved Structure Plan of 2002 promised the Green Belt for St Andrews would be set out in detail in the Local Plan. However the proposed Green Belt does not reflect the anticipated coverage. Whilst David Tyldesley was clear in his report to the Preservation Trust that the Green Belt must not become a corset and allow for development over the long term, it is not considered that St Andrews has a landscape capacity to cope with the large scale development as currently proposed. In addition there is concern that the golf courses have not been included in the proposed Green Belt which leaves the town very vulnerable and in danger of inappropriate development on the coast line.

Response:

The detailed boundary of the Green Belt is shown on the draft St Andrews and East Fife Local Plan. It has been delineated to provide for development need and this boundary will be defensible in the long term. Development on the coast/coastal step would be considered against relevant policies in the Area Local Plan.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Coast

Comment:

Statement in paragraph 4.45 is weak strategy that the criteria for development on the coast will be defined in the Local Plan.

Response:

Disagree. Policies contained in Approved Structure Plan, which are sufficiently robust to deal with this issue, are now Core Local Plan Policies, and will be included in the emerging Area Local Plans.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Paragraphs 1.21 and 1.27 discuss the future of the University of St Andrews. It should be noted that the University is a major land owner and should not be allowed to expand in to precious green field land. Nor should it be allowed to sell off land for housing which may be required for future University use including student residences.

Response:

The Finalised Structure Plan is clear that any growth of the University of St Andrews should be fully planned via the Master Planning approach and the Area Local Plan. Fife Council cannot require the University to provide new student accommodation.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is difficult to understand why the term medium is used in the context of St Andrews. With regards to Draft Plan Schedule H2 and H3, in comparing the size of population for each of the settlements where development is proposed alongside St Andrews, it could easily be argued that the large scale development refers to St Andrews and in the Glenrothes and Kirkcaldy case it could be considered to be medium scale. Large and medium scale development should be defined as a percentage of current housing stock and not in absolute numbers as this is extremely misleading.

Response:

The definition of the scale of development of housing in absolute, rather than, percentage terms is used considerably throughout the Plan. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan, Proposal H2.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The housing land requirements for St Andrews in the Draft Plan differ from those set in the approved Structure Plan 2002 without any explanation as to why this sudden change has occurred. It is important that this is more fully explained and the demand for housing for speculative purposes in St Andrews are made more transparent.

Response:

Significant changes have taken place which require the provision of land for new development for the period 2006-2026, which the emerging Development Plan addresses in setting the housing land requirement and allocations.

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

It is widely recognised that there is a shortage of affordable housing in St Andrews and that this situation must be addressed. Whilst the Draft Plan states that the only way to resolve a problem is to build more private housing with the developer providing 45% affordable or any expanding industry providing finance for this housing, it is considered that this is not the solution to the problem. It is considered that the University should be required to increase its student accommodation provision in line with increasing numbers.

Response:

In the light of PAN 74, the updated Housing Needs and Affordability Study and public consultation the percentage required for the St Andrews housing market area has been revised to 30%. The provision of affordable housing through the planning system is a legitimate means of contributing to meeting the need for affordable housing. This is supported by Scottish Executive's planning policy. Many other Local Authorities across Britain are using this approach. Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing. The issue of student accommodation in St Andrews is not a strategic planning matter and is more properly addressed by the St Andrews and East Fife Local Plan. Comment will be considered in that context. The University cannot be required to provide student accommodation.

Action:

Change percentage requirements in Finalised Plan Policy H4 (Draft Plan Policy H5).

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Regrettable that none of the increased affordable housing investment of over £12 million provided by Communities Scotland for Fife to the 2006-06 financial year will be spent in St Andrews.

Response:

Communities Scotland is aware of the identified shortages in the St Andrews area. Consequently several developments have been financed in the area in the last few years. Recent projects in the St Andrews area amount to £5 million investment from Communities Scotland. Fife Council and Communities Scotland are continuously reviewing land availability in the St Andrews area and funding has been provided to Kingdom Housing Association to identify future opportunities for housing.

Action:

No Change

Comment No: 12

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Concern that most of the housing developed in St Andrews has not been available to local people because it has been acquired by speculators to provide property for rental to students.

Response:

Although important, this is not a land use planning issue. The Implementation Guide on Affordable Housing sets out categories of priority clients to ensure that they have access to new affordable housing. The issue of HMOs is more properly addressed by the St Andrews and East Fife Local Plan. Comment will be considered in that context.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

With regard to Draft Plan Policy H6 in terms of St Andrews, given the draft Plan acknowledges the University as the prime driver of the local economy, this policy could, and should, be interpreted as requiring University authorities to provide additional student accommodation for their own uses.

Response:

Draft Plan Policy H6 has been deleted from both the Finalised Structure Plan and Supplementary Guidance on Affordable housing. However, text references to affordable housing provision and non-residential development will be retained. The issue of student accommodation in St Andrews is not a strategic planning issue but rather is more properly addressed by the St Andrews and East Fife Local Plan. Comment will be considered in that context. The University cannot be required to provide student accommodation.

Action:

Delete Draft Plan Policy H6.

Comment No: 14

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

University of St Andrews should be required to provide off street parking as this would be a major contribution to lessening local road congestion. Changes to the University's approach to parking could result in additional benefits to the town.

Response:

"Developer" parking is an issue to be addressed via Local Transport Plans.

Action:

No Change

Comment No: 15

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Design Quality

Comment:

Applaud the intention of Draft Plan Policy ENV3 and para 4.33 to create new developments which will achieve higher design quality.

Response:

Support noted. Draft Plan Policy ENV3 will be included in Area Local Plans.

Action:

Draft Plan Policy ENV3 will be included in Area Local Plans.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Suggests that in para 3.22 the reference to St Andrews with regard to a World Class Destination be amended to read a World Class Standard Destination. The shops in St Andrews are attractive to both international visitors and local people and many people wish to continue to shop there, therefore the local dimension must not be ignored. If St Andrews is to attract visitors to shop in the town it must provide more than the multiple stores seen in every town in the country.

Response:

Wording in para 3.22 has been deleted. The important local dimension to retail uses in St Andrews will not be ignored. Town centres are dynamic locations and cannot be preserved at one point in time. Fife Council will strive in partnership with others, to maintain and enhance the character of St Andrews town centre. The planning system can only exert limited control over types of retailing within the same Use Class Order.

Action:

Change text.

Comment No: 18

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Disappointed that there is no reference to a new secondary school in North East Fife other than Madras College and Bell Baxter High School. There is concern about proposed new development in St Andrews, Cupar and the surrounding areas without any suggestion how these two secondary schools, presently running at more than full capacity, will cope.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

St Andrews Green Belt Forum, Jackson, A A - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

The Report of Survey in its current form does not provide a basis for adequate designation of the new St Andrews Green Belt. Urge that the analysis on which the policies have been prepared are amended and elaborated. Particular concern that Fife Council has failed to discharge its responsibilities adequately regarding its commitment to a Green Belt for St Andrews as set out in the approved Fife Structure Plan 2002.

Response:

Disagree. The Green Belt has been developed in a manner consistent with Policy ENV1. Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries.

Action:

Policy and text amended.

Comment No: 02

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Sustainability

Appraisal

Subject: Sustainability

Comment:

The document, which purports to appraise Fife Matters, does not reflect best practice as it should adhere to Strategic Environmental Appraisal (SEA) Regulations and Scottish Executive guidance. It is unclear whether the exercise was undertaken in-house. Guidance on the application of sustainability appraisals of development plans emphasises that this exercise must be undertaken by a team independent from those responsible for drafting the plan or it degenerates into a rubber stamping process. Few policies are questioned. There are no details of formal public consultation on findings. Considered that exercise for Approved Fife Structure Plan 2002 much better.

Response:

The SEA is a draft version prepared in accordance with guidance and published for consultation purposes. The Policies were not appraised by the team responsible for the preparation of and appraisal was undertaken by a number of individuals who provide a breadth of experience which allowed a thorough evaluation of the policies. The Finalised Plan has been the subject of an SEA.

Action:

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Green Belt

Comment:

Report of Survey should provide the basis on which new policies are constituted. However, it does not address the key issue of the St Andrews Green Belt.

Response:

Disagree. The Report of Survey provides an adequate justification for Policy ENV1. A Detailed appraisal is undertaken through the St Andrews and East Fife Local Plan.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Whilst St Andrews is classified as a Medium Scale Development Area, the figures for housing development and population growth completely undermine this proposal. Approval of the proposals for St Andrews in their present form would see the town accommodate the largest proportionate increase in the whole of Fife, and would represent a complete capitulation to the speculative development interest which have been vigorously lobbying the planning authority.

Response:

The definition of the scale of development of housing in absolute, rather than, percentage terms is used considerably throughout the Plan. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Concerned that no accurate map of the proposed designated boundaries of the St Andrews Green Belt has been delineated in either the Structure Plan or the Draft Local Plan. It is considered that this is an inexcusable omission.

Response:

Disagree. The boundary of proposed Green Belt is delineated on the Local Plan maps.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Coast

Comment:

With regard to paragraph 4.45 it is considered that with this, together with the very weak draft Local Plan policy, offers no protection against inappropriate coastal development in an area designated as of high landscape value.

Response:

Disagree. Policies contained in Approved Structure Plan, which are sufficiently robust to deal with this issue, are now Core Local Plan Policies and will be included in the emerging Area Local Plans.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

The Green Belt should include the golf courses that lie adjacent to St Andrews. Deliberately omitting this area from Green Belt appears to indicate a wish to promote developments not in keeping with either the undeveloped coastline or the town's landscape setting. It is considered that this is also in contravention to the commitment given by the Scottish Executive in the approved 2002 Fife Structure Plan that the Green Belt would form a continuous band around the town including the golf links. Fife Council appears to have ignored the professional advice on the landscape provided by two separate landscape consultants.

Response:

The detailed boundary of the Green Belt is shown on the draft St Andrews and East Fife Local Plan. It has been delineated to provide for development need and this boundary will be defensible in the long term. Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries.

Action:

Policy and text amended.

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Sustainability Appraisal

Subject: Document

Comment:

The Appraisal does not reflect best practice and targets and indicators are not identified. There has been a lack of public consultation on the process, which is inferior to the exercise undertaken for the 2002 Structure Plan.

Response:

The Sustainability Appraisals of the draft and finalised Plans together with the Strategic Environmental Assessment of the Finalised Plan are considered to reflect best practice. The Scottish Executive Interim Planning Advice clearly recognises the methodology used within Fife as good/best practice. Over the past few years this has been improved upon, and more recently to ensure the new legislative requirements are met.

Action:

No Change

Comment No: 09

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Sustainability Appraisal

Subject: Document

Comment:

The appraisal does not meet the requirements of the SEA regulations and Scottish Executive guidance on strategic environmental assessment.

Response:

The Sustainability Appraisal of the draft Plan did not require to meet legislative requirements at that time. The Finalised Plan has been the subject of an SEA and this, together with a supporting document will be submitted to the Scottish Ministers and be available for public inspection.

Action:

Lillie, N - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

The structure and layout of the many planning documents, together with the limited consultation process and period, make it difficult for an informed citizen to achieve an overall understanding. Consideration should be given, at the next stage of the process, to publishing beside the Fife Structure Plan, single volume Local Area Plans that incorporate Structure Plan guidance on land use, education, recreation, transport, industrial and all other issues.

Response:

The Consultative Draft Structure Plan was in the pubic domain from late November 2004. The public consultation period was in excess of the statutory requirement and this was further extended to take account of comments submitted beyond the closing date. Concerns about planning documents and consultation exercise noted. Suggestions re Local Plans will be given consideration.

Action:

Review text for clarity.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Whilst setting out a strategy for St Andrews as one of the key centres for development the Structure Plan does not define what is meant by World Class.

Response:

St Andrews World Class is a partnership led by Scottish Enterprise Fife and involving Fife Council and local businesses, and has a representative of St Andrews Community Council, St Andrews Preservation Trust and St Andrews Merchant Association. It figures prominently as St Andrews is identified as a key centre in Fife. There is local input via Fife Council and the other local bodies.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The Structure Plan asserts, but does not demonstrate, the justification for a developer-led approach to new housing in St Andrews which has very significant land use implications.

Response:

Disagree that new housing proposed for St Andrews is developer-led. The proposals reflect the housing land requirement for St Andrews and East Fife, aimed at meeting the requirement for the town for the period 2006-2026 and addressing issues of affordable housing. Details of the calculation are contained in the Report of Survey. The scale of development is considered appropriate to meet locally-generated needs over the period.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Whilst the plan highlights the need for affordable housing in the St Andrews area it does not set out how this need will be achieved.

Response:

Disagree. The Supplementary Guidance on Affordable Housing and the Structure Plan can only address land use issues, i.e. delivery of affordable housing through the planning system. The Council is pursuing other means of delivery but these are not land use related.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Concerned that the population estimates used to determine requirements have varied between 14,500 and 16,900. This requires to be resolved prior to finalising housing need. In addition it is suggested that increases in the "grey, over-65" demand, student number increases and recent leisure/tourism developments in the area all have an influence on housing requirement in the St Andrews area.

Response:

The population basis for the housing land requirement is outlined in the Report of Survey and is based on Scottish Executive data. The housing land requirement is calculated to include a range of factors, which reflect local need, demand from changing population structure, etc. The increase in student numbers is not a factor in determining the requirement.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The policy of demand-driven, developer-led building has resulted in the population and housing in St Andrews being seriously out of balance. Structure Plan proposals that support a continuance of demand-driven developer led provision can only make the present imbalance worse and this policy should be amended.

Response:

Disagree that new housing proposed for St Andrews is developer-led. The proposals reflect the housing land requirement for St Andrews and East Fife, aimed at meeting the requirement for the town for the period 2006-2026 and addressing issues of affordable housing. Details of the calculation are contained in the Report of Survey. The scale of development contained in Finalised Plan Proposal H2 is considered appropriate to meet locally-generated needs over the period.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The policy of developer-led building should be changed as it has created the serious problem of a critical shortage of affordable housing. In addition there has been a major increase in the over-65 retiree population and a large number of houses which have been converted to houses in multiple occupation.

Response:

Disagree that new housing proposed for St Andrews is developer-led. The proposals reflect the housing land requirement for St Andrews and East Fife, aimed at meeting the requirement for the town for the period 2006-2026 and addressing issues of affordable housing as set out in Draft Plan Policy H5 (now Finalised Plan H4). The issue of Houses in Multiple Occupation is not a strategic planning matter and is addressed in the St Andrews and East Fife Local Plan.

Action:

Draft Plan Policy H5 is now Finalised Plan Policy H4.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The position with regard to affordable housing in St Andrews is serious and requires a clearer policy as it is a priority.

Response:

Noted. However, this comment is more properly addressed by the St Andrews and East Fife Local Plan and will be considered in that context.

Action:

No Change

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Houses in Multiple Occupancy

Comment:

The University should be directed to develop additional student housing thereby reducing the demand for houses in multiple occupation. In addition this would release a significant amount of property to the market. A target of releasing between 400 and 500 houses should be set.

Response:

The University cannot be required to provide student accommodation. The Council is however, liaising with the University. It is acknowledged that houses in multiple occupation is an important local issue. However as the Structure Plan is a strategic document, this matter is more appropriately addressed by the Local Plan process, especially the St Andrews and East Fife Local Plan

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

It is suggested that the problem of affordable housing could be addressed by the establishment of a St Andrews Housing Management Association.

Response:

It is considered that the current arrangements are satisfactory in terms of organisational mechanisms. This, however, is not a land use planning matter.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Affordable housing must be permanent however recent experience in the area shows affordable housing is sold on after about five years at market value therefore it does not remain as part of the affordable stock.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

No Change

Comment No: 12

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

For the first ten years of the Structure Plan i.e. 2006-2016, only affordable houses in permanent shared ownership should be built. In addition it is considered that no new private sector houses should be built during 2006 - 2016 and the market will take care of the demand as houses in multiple occupation are released for sale.

Response:

Noted. The housing land requirement must address issues of housing demand beyond those of affordability, including demand created by the continuing reduction in household size and inward migration. The Development Plan cannot place an embargo on private sector development.

Action:

Stapleton, JR - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

The St Andrews shopping centre will only be enhanced if tourists/leisure retail developments do not expand. There are a finite number of shops available and vital services to the community (e.g. butcher, greengrocer, ironmonger, fishmonger) must be maintained.

Response:

Noted. However, town centres are dynamic locations and the planning system cannot preserve a location at any point in time. The planning system can only exert limited control over types of retailing within the same Use Class Order. St Andrews town centre's local role in serving residents is acknowledged.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

How can realistic comments be made about the Local Plan that depends on a Structure Plan that is also in draft form for consultation? In addition, with six documents requiring comment at the same time, it is impossible to be sure that comments are being made to the correct plan.

Response:

The Draft Structure Plan and Local Plan were in the public domain from late November 2004 onwards. It was considered helpful to publish the Structure Plan and Local Plan at the same time. Your comments are noted. The consultation process is under review to improve consultation in the future. Local Plans can be prepared on the basis of an emerging Structure Plan but they cannot be Adopted unless they are consistent with the Approved Structure Plan. The comments form was intended to assist consultees ensure that comments were made in relation the appropriate plan.

Action:

Review consultation process.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

It is acknowledged there is a major problem with lack of affordable housing in St Andrews which results in environmentally undesirable commuting. The affordable housing market needs to take most of the available expansion space and the houses must remain affordable in perpetuity. This requires either Housing Association building, or a shared equity scheme or, as in the Channel Islands, a controlled housing market.

Response:

Noted. However, Scottish Executive and Fife Council Policy is that mixed, diverse and balanced communities involving a range of tenures and types of housing should be promoted. Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing. Housing associations do have a role to play although the scale of need means that they can only make a contribution rather than meet the need in entirety. Fife Council will be piloting the new shared equity scheme "Home Stake".

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

The available area for realistic expansion of St Andrews without destroying the landscape setting is very limited.

Response:

The boundary of the St Andrews Green Belt as proposed has been drawn taking full account of all the natural and built environmental issues including the landscape setting.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

The present density of tourist related shops is as high as it can go without destroying the ability of the residents of St Andrews to do the majority of their shopping locally. At present most things are available in the town but with no or very limited choice of shop. If tourist related shops in are allowed to dominate the town centre they will move some of these essential shops there will be no option to travel away from St Andrews to shop and this is not sustainable.

Response:

Noted. However, town centres are dynamic locations and the planning system cannot preserve a location at any point in time. The planning system can only exert limited control over types of retailing within the same Use Class Order. The importance of St Andrews town centre's local role in serving residents is acknowledged.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Fife Matters fails to define St Andrews World Class. It is considered that the town is World Class mainly because of its golf connection. However the setting of the historic town is secondary to the golf and expanding the town as proposed would spoil the attraction of all but the golf. For St Andrews to remain World Class it must not be expanded.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. St Andrews World Class is a partnership led by Scottish Enterprise Fife and involving Fife Council and local businesses, and has a representative of St Andrews Community Council, St Andrews Preservation Trust and St Andrews Merchant Association.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

It is not clear why St Andrews requires 1000-1800 new houses as shown in para 3.33, Policy H1 and Schedules H1 and H3, when the currently approved Structure Plan sets zero requirement. Prepared to accept 200 to 300 if 50% were affordable in perpetuity. In addition it is considered that it is impossible to envisage how the proposed number of houses could be built without destroying the landscape setting of the town and creating additional transport infrastructure problems.

Response:

The justification for the housing land requirement is contained in the Report of Survey. The nil requirement in the Approved Structure Plan, 2002 was informed by the 1998 Strategic Study. Significant changes have taken place in the interim, including decreasing household size and the demand for affordable housing, which require the provision of land for new development. Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Any new development would be subject to policies in the Structure Plan and Area Local Plan that give full consideration to issues of landscape and infrastructure provision.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

St Andrews is remote form the rest of Fife in terms of transport links and it would be difficult to give a major boost to the economy of Central Fife from such a distance. The transport infrastructure of St Andrews is such that any increase in links with Central/West Fife would result by an increase in the use if the car which is against the Council's declared aims to reduce dependence on the car.

Response:

Disagree. It is considered that there is scope for manufacturing and other downstream employment opportunities in Mid Fife derived from research and development in St Andrews. This does not require additional commuting on the scale suggested in this comment.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

The document was designed to be printed in fashionable colours. Printing the PDF version on a monochrome laser printer produced grey text which is difficult to read and consideration should be given to clarity in producing future documents.

Response:

Comments noted.

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Developer provided affordable housing rapidly becomes unaffordable on the open market.

Response:

Not all affordable housing will be provided through mainstream housing development. Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

Smith, Eric M - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The premise that affordable housing should be based on an agreed fraction of the total housing construction by developers is a very poor way of arriving at a good consensus. The issue could be resolved by drawing up a housing list identifying those requiring housing by a number of categories. Only when families that meet the criteria for provision of affordable housing have been satisfied should any consideration be given to others seeking to move to St Andrews simply because it is a desirable area.

Response:

The updated Housing Needs and Affordability Study has identified a need for just under 1,500 new affordable houses in the St Andrews housing market area. Fife Council's Housing Service has drawn up a list of criteria to assess priority clients. The scale of the affordable housing shortage in Fife, and especially in the St Andrews housing market area, is such that a variety of mechanisms are required in order to address it. In such situations, the planning system can make a contribution. This approach is supported by the Scottish Executive. Many other local authorities throughout Britain are using this approach.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

It is considered that it should not be possible for an occupant to sell off an affordable house for profit, particularly if the cost of construction, upkeep and maintenance of the property is paid for by Fife Council.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing. With regard to Council owned stock, Fife Council is currently seeking to suspend the right-to-buy in several pressured areas in Fife.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

It is considered that the city of St Andrews needs to adjust its population mix to include young families who have interests in working within and close to the town. At present the mix is distorted comprising mainly of University students, commuters and retired couples who can afford houses. The needs of these three categories mentioned above could be met either via the University or through private developers.

Response:

The Finalised Structure Plan seeks to address the issue of a sustainable population structure via the provision of affordable housing (see Finalised Plan Policy H4 - Draft Plan Policy H5).

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Density

Comment:

The density of housing development needs to be closely monitored with heavy penalties for any contravention.

Response:

Policy MO1: Plan Monitoring outlines the commitment to producing a monitoring statement to indicate progress made with the Plan. Planning permissions will be granted where they are in accordance with Draft Plan Policy H8 (now Finalised Plan H6) unless exceptional circumstances determine otherwise.

Action:

McCall, M F - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

It is not clear why St Andrews requires so much new housing as proposed in Fife Matters as the town has restricted infrastructure and landscape capacity to accommodate any new development. These problems should be dealt with before there is any major increase in the population.

Response:

The justification for the housing land requirement and housing allocations is contained within the Report of Survey. The Structure Plan gives an indication of the broad location and scale of Strategic Development Areas and Other Strategic Land Allocations, with the Area Local Plan giving detailed consideration to the details of site boundaries, landscape capacity and infrastructure provision.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

With regard to Draft Plan Policy H5 (now Finalised Plan Policy H4) there is certainly a need for affordable housing in St Andrews.

Response:

Support in principle noted. Draft Plan Policy H5 is now Finalised Plan Policy H4.

Action:

Draft Plan Policy H5 is now Finalised Plan Policy H4.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

A method of providing it should be found without having more executive housing and the method of provision should guarantee its continued affordability.

Response:

The provision of affordable housing through the planning system is a legitimate means of contributing to meeting the need for affordable housing. This is supported by the Scottish Executive's planning policy. May other Local Authorities across Britain are using this approach. Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Houses in Multiple Occupancy

Comment:

Fife Council should as soon as possible find ways of restricting houses in multiple occupation for all types of housing.

Response:

Noted. It is acknowledged that this is an important local issue. However as the Structure Plan is a strategic document, this matter is more appropriately addressed by the Local Plan process, especially the St Andrews and East Fife Local Plan.

Action:

Taylor, Nan - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

It is unclear how Fife Council can propose allocating housing land as per Schedule H3 and the provision of affordable housing as per Policy H5 as both appear to completely ignore the contents of the St Andrews Strategic Study of 1998.

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan, which was approved in 2002. Significant changes have taken place since then which require the provision of land for new development for the period 2006-2026 and the emerging Development Plan is addressing these requirements for both affordable and market housing. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

It is not clear how the Green Belt, mentioned in the Strategic Study conclusion 6, can be revised to that shown in the Local Plan.

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

St Andrews is almost unique in Europe as much of it is exactly as it was in the 15th Century. Preserving the character of St Andrews and it setting has been a high priority for planners in the past but there seems to be a total insensitivity to all that has gone before the draft Structure Plan.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Black, E - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Concerned about the availability of housing in St Andrews to provide for ordinary people who work in the lower paid service sector. "Council house type" properties must be built and provided for people who cannot, or do not want to, buy a house.

Response:

The broad definition of affordable housing contained in the Structure Plan and Supplementary Guidance on affordable housing includes social rented housing. The Council's preference is for 65% of affordable housing to be of this tenure. However the precise amount of this tenure delivered will inevitably be dependant on the amount of Communities Scotland Funding that is available.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Large houses for commuters would do nothing for St Andrews except add to the existing transport problems in the town.

Response:

Concerns noted. The Development Plan aims to provide for a range of sites and tenures in order to promote mixed and balanced communities. In allocating sites, preference is given to land close to jobs and services and well served by public transport. Development in St Andrews would be progressed with full consideration of the potential traffic impacts on the own.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

It should be made clear who requires the planned 1000-2000 houses for St Andrews, e.g. is it driven by local needs, developer pressure or commuter demands?

Response:

The provision of new housing in St Andrews for the period 2006-2026 as set out in Finalised Plan Proposal H2 is aimed at meeting locally-generated needs over the Plan period. This will address the need to provide additional housing supply, includes affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000 - 1,800 to 1,200 in Finalised Plan.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Concerned that many of those moving into the settlements in the East Neuk of Fife will largely travel through St Andrews. In order to prevent even more traffic congestion in St Andrews it is considered that there should be a ring route round the town.

Response:

Concerns noted, but studies show that only 7% of St Andrews traffic is through-traffic. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years, a reduction from the consultative draft Plan which identified 1,000-1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing and to facilitate a new link road for the town.

Action:

Donald, E - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The Plan is a developer's wish list and there is a genuine lack of consideration as to how best to serve the needs of St Andrews. The scale of development proposed would result in St Andrews becoming less attractive.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Building 1850 new houses in St Andrews over the next twenty years would have significant impact on traffic, schools, health facilities and drainage and would increase the population by the order of 30%.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. Full account has been taken of the infrastructure and requirements and this will be addressed in detail via the Area Local Plan, Master Plans and development briefs. The housing allocation for St Andrews has been reduced from 1,000-1,800 to 1,200 houses in the Finalised Plan.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Fife Council's proposals that change be driven by economic gain, by expanding tourism and promoting spin off companies form the University of St Andrews, is not what is in the best interest of St Andrews and its residents.

Response:

There are benefits to both St Andrews and the rest of Fife to be gained from the strategy approach adopted in the Finalised Structure Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

As neither major employers, the University or Leuchars will be expanding within the period of the plan, the proposed new housing would be bought by commuters travelling to Dundee or Edinburgh or by retirees, forcing young people out of the town.

Response:

Disagree. The provision of housing planned for 2006-2026 is aimed at meeting locally-generated needs over the Plan period, with issues of affordable housing addressed in Finalised Plan H4 (Draft Plan Policy H5 now Finalised Plan H4 and Draft Plan Policy H6 has been deleted). The detail of the calculation of the housing land requirement is set out in the Report of Survey.

Action:

Affordable housing allocations in Finalised Plan H4. Draft Plan Policy H6 deleted.

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

St Andrews World Class is not defined.

Response:

St Andrews World Class is a partnership led by Scottish Enterprise of local businesses and public agencies including Fife Council and local businesses and has a representative of St Andrews Community Council, St Andrews Preservation Trust and St Andrews Merchant Association. It figures prominently as St Andrews is identified as a key centre in Fife. There is local input via Fife Council and the other local bodies.

Action:

St Andrews Merchants' Association, Inch, Robert - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

In relation to paragraph 3.22 pleased to note the acknowledgement that St Andrews requires to be managed to ensure its vibrancy is continued and its quality enhanced. Fife Matters states that this should be achieved by focussing on tourism and visitor related retailing however this focus should be extended to ensuring the availability of the diverse range of independent and national shops in the centre, not just tourist related shops. It is a diversity that makes St Andrews such an attractive retail centre.

Response:

Wording in para 3.22 has been deleted. Town centres are dynamic locations and the planning system cannot preserve a location at any point in time. Agree however that vibrancy and quality are important. The planning system can only exert limited control over types of retailing within the same Use Class Order. The importance of St Andrews town centre's role in serving residents is acknowledged.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

The viability of St Andrews centre is affected by transportation issues and congestion problems which require to be addressed.

Response:

This is an issue to be addressed via the Local Transport Strategy and Area Transport Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

Out of town shopping centres and off centre retail developments would affect the viability of St Andrews centre and there should be a general policy against such developments in the St Andrews area.

Response:

The Finalised Structure Plan aims to support and enhance town centres including St Andrews and it adopts a sequential approach. However, it is not possible to rigidly apply such a restriction in entirety and satisfy Scottish Executive guidance in NPPG8/SPP8. Guidance does allow retail development in other appropriate locations.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Not opposed to the development of between 1000 and 1800 new houses in the St Andrews area, however the local infrastructure requires to be upgraded and town centre traffic situation requires to be improved.

Response:

Comments noted. Development Plan policy as outlined in the Structure Plan and Area Local Plan addresses issues of local infrastructure and traffic generation which must be considered in implementing development proposals.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Strongly support the reintroduction of a rail link to St Andrews and would like to see a firm proposal included in Fife Matters.

Response:

Support noted. Proposal PT1 of the Finalised Structure Plan (Draft Plan Proposal PT2) includes the commitment to further consideration of transport link options for St Andrews to the rail network, to be addressed through the review of the Local Transport Strategy.

Action:

Humphries, Frances N C - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

The proposed Green Belt is a mockery of what is required to protect the character of the town and opens the door to all kinds of development. The boundaries are too narrow and totally fail to protect the town and the landscape setting of the town will be ruined.

Response:

The detailed boundary of the Green Belt is shown on the draft St Andrews and East Fife Local Plan. It has been delineated to provide for development need and this boundary will be defensible in the long term.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

It is accepted that there is a shortfall of affordable housing in St Andrews however to build additional houses for sale to provide affordable housing is not the answer.

Response:

Noted. However, the provision of affordable housing through the planning system is a legitimate means of contributing to meeting the need for affordable housing. This is supported by the Scottish Executive's planning policy. Many other local authorities across Britain are using this approach.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Houses in Multiple Occupancy

Comment:

Concerned about the number of houses in multiple occupancy which results in people being squeezed out of the town centre. St Andrews is becoming a university campus and the strong community spirit which was once a feature of the town has almost disappeared.

Response:

Noted. It is acknowledged that this is an important local issue. However as the Structure Plan is a strategic document, this matter is more appropriately addressed by the Local Plan process, including the St Andrews and East Fife Local Plan. The Council is liaising with the University.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Not clear why there is no mention of a new secondary school for the St Andrews areas in Fife Matters given the situation at Madras College which is bursting at the seams.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Very disappointed at the consultative meeting held in St Andrews. Appears that the Fife Council departments work in isolation and do not appear to communicate. Also concerned that the planners appear to know very little about St Andrews.

Response:

Concerns about meeting noted. Agree that a corporate effort is needed but the Draft Plans were prepared by Development Services in partnership with other Council Services and Community Planning Partners.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Concerned that the maps on display at the public meeting were badly presented and not up to date.

Response:

Base maps are prepared by the Ordnance Survey and it is not possible for these to be continually updated.

Action:

Kirkwood, Thomas D C - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Concerned that the proposals are inadequate because they fail to deliver the Green Belt of sufficient width/depth round the whole of St Andrews, especially on the West Side of the town. A significant Green Belt was mandated by the Scottish Executive in approving the 2002 Structure Plan. The currently proposed Green Belt boundaries allow for extensive building in areas which would harm the landscape setting of St Andrews. The Green Belt should be based on the existing town of St Andrews and should include a minimum width/depth of say 1000m and should be the perimeter within which the Local Plan proposals are developed.

Response:

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which also identify the boundaries. The detailed boundary of the Green Belt is shown on the draft St Andrews and East Fife Local Plan. It has been delineated to provide for development need and this boundary will be defensible in the long term.

Action:

Policy and text amended.

Hill, Susan - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

St Andrews requires a town centre for locals and tourists within which people can move around freely.

Response:

Ease of movement is a key factor in town centres. This will be taken into account in the assessment of any future proposals for St Andrews town centre. Comment is more appropriate to the Local Transport Strategy, Area Transport Plan and the emerging St Andrews and East Fife Local Plan.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Development of St Andrews should be controlled to prevent it spreading onto the Southern hillside.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

What does 45% affordable housing mean.

Response:

This percentage requirement has been revised in light of PAN 74 the public consultation and the updated Housing Needs and Affordability Study. This means that a specific percentage of a housing site (or an equivalent value in terms of houses/financial sum) should be for affordable housing. Fife Council's clear preference is for built units on site.

Action:

Change percentage requirements in Finalised Plan Policy H4 (Draft Plan Policy H5).

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Suggest that affordable housing should be shared ownership with Housing Associations.

Response:

Both shared ownership schemes and housing association provision in general have a role to play in meeting the need for affordable housing. Fife Council is actively pursuing the new "Homestake Scheme". However, they can only make a limited contribution and cannot address the shortfall in entirety.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Potential owners should be St Andrews born or work in St Andrews.

Response:

This is not a strategic land use planning issue. However, it is addressed in the Implementation Guide for Affordable Housing produced by the Council's housing service. This includes applicants with a local connection. It is not feasible to offer affordable housing only to those with a local connection. Some provision must be made for incoming workers for example.

Action:

Stewart, Ilene - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Does not agree with the Structure Plan housing allocations as it makes St Andrews and Eastern area far too congested.

Response:

Recognise concerns raised. The Structure Plan identifies the scale and general location of development proposed. The St Andrews and East Fife Local Plan will give detailed consideration to the location and phasing of development.

Action:

No Change.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Why has the scale of the Green Belt been reduced from that in previous plans?

Response:

The boundary of the St Andrews Green Belt is delineated for the first time in the draft Local Plan. The Green Belt is designated to provide for necessary development and secure other policy objectives.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Agree that affordable houses are needed but opposed to funding by building houses for sale.

Response:

The scale of the affordable housing shortage in Fife is such that Communities Scotland investment is unable to address it in entirety. In such situations, the planning system can make a legitimate contribution through the delivery of mainstream housing. The provision of affordable housing through the planning system is a legitimate means of contributing to meeting the need for affordable housing. This is supported by the Scottish Executive's planning policy. Many other local authorities across Britain are using this approach. Fife Council is also pursuing a range of other initiatives to facilitate affordable housing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Concerned that St Andrews will become a dormitory town for commuters to Dundee and Kirkcaldy etc. as it is special and it should be kept as such. Would like to have an accurate count of the population.

Response:

Disagree. Housing need figures calculated by Fife Council using Scottish Executive specified methods. St Andrews has the potential to play a vital role in encouraging new employment opportunities. Census and General Register Office information is available in public domain.

Action:

Foster, Frances M - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

There is no evidence that affordable housing of the quantity proposed is for local St Andrews people and workers. The houses could be used to house people for outside St Andrews.

Response:

Disagree. The amount of affordable housing required for the St Andrews housing market area was quantified by the updated Housing Needs and Affordability Study. This amounts to just under 1,500 units. It is the Council's intention that need should be met as locally as possible and wherever possible within the housing market area in which it arises. However, some provision should be made for incoming workers for example.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Roads

Comment:

The infrastructure can barely cope with the current demands and in particular the roads are all in a state of disrepair.

Response:

Road repairs/maintenance is not a strategic planning issue and is the responsibility of Transport Scotland and Fife Council's Transportation Services.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Where is the industry and economy in St Andrews to justify the number of houses proposed? New development will result in St Andrews becoming a commuter town for Edinburgh.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. St Andrews has the potential to play a vital role in encouraging new employment opportunities. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Hardie, P A - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

Objects to the plan for East Fife whereby St Andrews is identified as an economic driver for the whole of Fife.

Response:

St Andrews will not be the sole economic driver for the whole of Fife but it does have the potential to make a significant contribution to securing new employment opportunities.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Concerned that the number of houses proposed for St Andrews as the population data used for forecast purposes appear to be suspect. Raises concern about the amount of development to provide infrastructure and affordable housing. St Andrews is a town of massive architectural merit, great historical content and is bursting at the seams.

Response:

Concerns noted. Housing need figures calculated by Fife Council using Scottish Executive specified methods. It is considered that there is for St Andrews to play a vital role in encouraging new employment opportunities. The landscape and historic built environment issues have been fully considered as part of the process of delineating the areas for development and for Green Belt status in Area Local Plan.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Roads

Comment:

Concerned that the road system in St Andrews is poorly maintained and inadequate to meet demands of any increased use and car parking provision is inadequate.

Response:

Concerns noted. Maintenance and car parking are issues to be addressed by the Local Transport Strategy and Area Transport Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Houses in Multiple Occupancy

Comment:

St Andrews currently has problems due to the high proportion of houses in multiple occupation.

Response:

Noted. It is acknowledged that this is an important local issue. However as the Structure Plan is a strategic document, this matter is more appropriately addressed by the Local Plan process, especially the St Andrews and East Fife Local Plan.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

St Andrews lacks a good proportion of affordable housing, a situation probably due to the number of houses in multiple occupation.

Response:

St Andrews does indeed lack affordable housing and this is addressed at least in part by the Structure Plan. The issue of Housing in Multiple Occupation is more properly addressed by the St Andrews and East Fife Local Plan and will be considered in that context.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Objects to the numbers of houses proposed for the next 5 and 10 year periods as there appears to be no logical explanation given.

Response:

Objection noted. The Report of Survey outlines the calculation of the housing land requirement for St Andrews and East Fife, which aims to meet locally-generated needs for the period 2006-2026. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

The merits of St Andrews, which is of national importance, demands more space, distant views and peace away from the ever increasing pollution of traffic in order to enjoy and to sustain its quality. Considers that the town nestles up in its national boundaries and conforms to PAN 44. Objects to the development proposals because the landscape capacity and character do not appear to have been given due consideration.

Response:

The boundary of the St Andrews Green Belt as proposed has been drawn taking full account of all the natural and built environmental issues including the landscape setting.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Roads

Comment:

The Transportation Plan makes no provision for a relief road to relieve the heavy through traffic resulting from the increase of growth in the East Neuk towns. The A917 passes close to the cathedral and is the subject of a mini roundabout. This is archaic when related to the historic core. This is surely the matter that should be brought to the attention of the Scottish Executive and worthy of a mention I the long tern plan. A number of other towns have benefited from a relief road and a list including Dumfries, Castle Douglas, Kelso, Inverurie, Tain amongst others.

Response:

This is an issue to be addressed via the Local Transport Strategy and Area Transport Plan. Comments passed to Transportation Services.

Action:

No Change

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

It is stated in the draft local plan that "the establishment of a Green Belt will not prevent the planned development of both communities". At the public meeting it was further stated that the Green Belt would not be chipped away by developers. As a consequence it would be to the approval of the developers something of a turnaround for the Green Belt philosophy especially when the Scottish Executive has identified St Andrews as the subject of only one of two green belts in Scotland. Objects to the Green Belt based on the criterion quoted.

Response:

The detailed boundary of the Green Belt is shown on the draft St Andrews and East Fife Local Plan. It has been delineated to provide for development need and this boundary will be defensible in the long term. Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries.

Action:

Policy and text amended.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Comments in respect to St Leonards the land at Craigtoun, North Bate and Bassaguard is identified for development and is unnecessary to propose houses at St Andrews as a result of this. Abbey Park House and St Nicholas are both lists of B houses and the grounds including superb trees. Concerned at the number of houses proposed on this site. No mention that this area is within the conservation area. Entirely reasonable to identify an area of land for amenity for an increases population but some of it includes failing the native trees.

Response:

These are issues to be addressed via Area Local Plan.

Action:

No Change

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

There is no mention of how the schools will cope with the increase in population. At the public meeting it was heard that the school is at full capacity. Bussing children is problematic. This should have been considered in the draft Structure Plan.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

Finlay, Scott - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

What is Fife Council doing to support local businesses? Should they not be trying to retain the brown field sites to help businesses survive as part of the community?

Response:

Fife Council and a number of partnership agencies are continually engaged in providing a wide range of support activities for local business. Brownfield land is identified for a range of development opportunities including providing employment land.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

The Council is committed to promoting a greener transport policy. Why then do they continue to transport twelve bus loads of children to Madras College every day?

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Where is the provision for another secondary school at the Tay Bridgehead? This has been spoken about twenty years ago - the Structure Plan covers another twenty years but makes no mention of it.

Response:

The issue of secondary education in the Tay Bridgehead/ St Andrews area should be resolved as part of the ongoing Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. It is intended that school places will be provided timeously to service planned new development.

Action:

Finlay, D - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Tourism

Comment:

Object to marketing St Andrews as an international Disney Golf destination. It is already an international golf and academic centre and does not require the public's money spent to market the town and has already been commercialised to its capacity.

Response:

The Finalised Structure Plan acknowledges that St Andrews has a heritage of international renown. There is always scope for improvement however. This is not a strategic planning issue.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

Object to Fife's population increasing this should be left to naturally grow. Scottish Executive and Fife Council should be focussing on encouraging businesses to Fife preferably high end tech and light engineering.

Response:

Objection noted. If left, considerable parts of Fife would experience population decline. Fife's economy requires to be boosted and the proposals set out in the Finalised Structure Plan can achieve this. Fife Council and other agencies are seeking to encourage businesses to come to and grow in Fife in a wide range of sectors.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

The Scottish Executive and Fife Council should be focussing on encouraging businesses to Fife preferably high end, tech and light engineering.

Response:

Fife's proposals for economic development are drawn up by the Fife Economic Forum and are set out in Growing Fife's future - An Economic Strategy for Fife in 2005-15. Structure Plan strategy aims to encourage a range of businesses including light manufacturing businesses and technology based companies.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Public Transport

Comment:

Object to lack of investment in the rail links. The Scottish Executive should be developing the railways and rail links to help the environment and give Scottish people an alternative to the car.

Response:

Fife Council has invested in rail associated improvements which include platform extensions. Fife Council has also pressed for rail improvements.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

Found the document heavy reading and hard to request to have it copied. Copies of the document should be available free of charge to take home and study.

Response:

Copies of the document were made available free of charge at www.fifedirect.org.uk/developmentplan. Copies were available for purchase in paper versions or as a CD-ROM. Copies were also available in libraries throughout Fife.

Action:

Morton, William - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

When the new halls of residence in St Andrews were built by the University we were told that the infrastructure could not take any more development. In 1998 the Strategic Study rejected major housing development in St Andrews, then in 2002 the finalised Structure plan identified the need for zero houses until 2011. There is no demand for new homes in St Andrews except that is where the developer demand is. The cost of the infrastructure required for the development will finish up as part of the Council Tax.

Response:

The appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned. The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements. It is intended developer contributions will be used to provide infrastructure and services and Fife Council may be required to make some investment in capital and revenue costs.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Roads

Comment:

Better roads must be built to provide better access to the coastal towns rather than route heavy traffic through St Andrews.

Response:

This is an issue to be addressed via the Local Transport Strategy and Area Transport Plan. Comments passed to Transportation Services.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Academic expansion should be halted now as that is as a big a threat to the town of St Andrews. I understand that in the last 50 years the student population has increased from approximately 1,800 to an excess of 8,000 and rising.

Response:

The future growth of the University as an internal issue to that organisation. However, Fife Council is supportive of the role the University can play in growing the Fife Economy.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Money would be better spent improving the infrastructure of Glenrothes, Cupar, Kirkcaldy and Dunfermline. More business parks should be built in these towns.

Response:

Noted.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Considers that the vast majority of St Andrews residents do not want any further development on the outskirts of the town. The current infrastructure does not cope with existing town structure.

Response:

Concerns noted. It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Considers that more time should have been given or would have been useful and while the meetings were useful a brief handout should have made readily available or better still delivered to each house.

Response:

The main consultation documents were in the public domain from late November 2004. The public consultation leaflet was widely available and the Fifer newspaper, which is delivered to every household in Fife, provided information about the Plan and the consultation exercise.

Action:

Dickens, M - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

St Andrews does not need nor can support the number of new houses proposed in the Structure Plan. 1800 houses over the next twenty years is not medium growth it is high growth for a small town. Concerned that an accurate population figure for the town could not be given.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. Population data is available from Census and General Register Office. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town. Population data in Finalised Report of survey.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

It was stated in the St Andrews Strategic Study in 1998 that the town was at its landscape capacity. Has this changed?

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

This policy must be properly implemented so that long term affordability is maintained. How will this be achieved?

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

There is no proposal for a new secondary school in the area. Madras has been overcrowded for a very long time and this needs to be urgently addressed.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

McIver, Joyce - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

With regard to Chapter 2 paragraphs 2.05 and 2.06 of the Structure Plan comparative scale of housing should be in percentage terms i.e. increase in current housing stock and not in absolute numbers. An additional thousand houses in St Andrews will have 3 to 4 times the impact of the same number built in Dunfermline, Glenrothes or Kirkcaldy. The methodology is flawed and misleading and requires revision. The phrase 'medium scale growth in St Andrews' is misleading. The housing stick will grow (based on 2001 figures) will grow by 18% to 2016 and by 32% by 2026. This compares dramatically with Dunfermline, Glenrothes and Kirkcaldy described as areas of large scale growth which will only grow at one third of the rate of St Andrews to 2016 and with the exception of Dunfermline with half the rate to 2026. St Andrews will experience large scale growth with other larger towns having medium growth by comparison. To define the growth rate in absolute terms i.e. as in numbers of houses as opposed to the more accurate percentage basis totally flawed and seriously misleading.

Response:

Objection noted. The method of quoting or proposing growth in absolute figures rather than in percentages has been adopted in the Finalised Structure Plan.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Policy ENV1 is weak and virtually encourages development in the Green Belt. This does not relate to what has been perceived by several landscape experts as the natural Green Belt around St Andrews.

Response:

Disagree. It provides the basis for the St Andrews and East Fife Local Plan defining a long term defendable boundary. The St Andrews Green Belt has been delineated in the draft Local Plan taking account of all the relevant issues.

Action:

Finlay, D - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Objects to Fife having its population increased above the natural percentage. Considers there is no need to try and force growth and population.

Response:

Objection noted. The approach suggested would not result in the existing problems of Fife being addressed. Fife Council is seeking to attract a range of employment opportunities including those mentioned. The Council is currently undertaking a report looking at demographic change in Fife over the Structure Plan period. This report will reinforce the justification for the policy assumptions on population growth and provide further information to support the strategy.

While the 2002 based population projections for Scotland show decline nationally, at a sub regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

Councils such as West Lothian, East Lothian and Stirling are all projected by the GRO (General Register Office for Scotland) to have population growth over 9% in the period up to 2018.

Fife is now coming under the influence of the Edinburgh City Region. Between 2000 and 2004 the population of Fife has grown by over 6,000. This level of growth easily meets the 5% aspirational population target set for Fife over a twenty year period. Recently published 2004 based population projections show Fife growing by 9.1% over the next twenty years.

Action:

Demographics work has been updated, the details of which are contained in the Report of Survey.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Objects to the amount of housing with proposed increase in housing in St Andrews. This would be forcing an unwarranted growth venture.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

If anything some affordable housing may be required centrally in perhaps Bassaguard/Memorial Hospital and kept affordable i.e. off the open market.

Response:

This matter is site specific and as such more properly addressed by the St Andrews and East Fife Local Plan. Comment will be considered in that context.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Roads

Comment:

The traffic plan would be wasting tax payers money in many areas. These include 20 MPH (speed limit is not the problem), parking on Kinburn Tennis Courts, in Petheram Car Park, The Links, The Pends and the Bypass Road.

Response:

Comments passed to Transportation Services, this is an issue to be addressed via the Local Transport Strategy and Area Transport Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

The information on Plan dates and the difference between the documents i.e. what they are, strategic, local etc was difficult to understand. The consultation period for responding in writing is too short and the method of replying was confusing.

Response:

Each document provided information about its purpose however comments re inter-relations help of documents will be given further consideration. The documents were in the public domain from late November 2004 onwards. The public consultation period was in excess of the statutory requirement and this was further extended to take account of comments submitted well beyond the closing date. The comments form was intended to assist consultees ensure comments were made in relation to the appropriate plan.

Action:

Review consultation process.

Speir, M - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Concerned at the proposed enlargement of St Andrews and considers the infrastructure will not cope. Concerned about use of building site in St Andrews being developed into three storey blocks of flats and these are not in the keeping.

Response:

Appropriate infrastructure and facilities will be in place to facilitate development planned. Site specific concerns should be addressed via development control process.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Shopping and retail opportunities are diminished by the threat of pedestrianisation of the centre of the town (St Andrews).

Response:

Disagree. Increased pedestrianisation is generally accepted to improve the shopping experience in terms of safety and environment. This is a detailed issue however and more appropriately addressed by the St Andrews and East Fife Local Plan.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

The promises made about the Green Belt are not being kept.

Response:

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries.

Action:

Policy and text amended.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Roads

Comment:

Parking is inadequate at the proposed St Andrews hospital.

Response:

This is a site specific issue and will be addressed via the Area Local Plan and development control process.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

A new school to cope with North East Fife is essential.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

Weir, Gregory - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

The plan overall is only aspirational and is a developer's wish list rather than a proper and focussed consideration as to how best to serve the genuine needs of St Andrews. St Andrews would be degraded by the plan and become less rather than more of an attraction.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

The increase in population and inevitably increases in traffic is of concern.

Response:

Concerns noted. It is intended that new development driven by an increasing population will not result in additional problems such as traffic congestion.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

The views coming into St Andrews need to be preserved. The 1998 Strategic Study identified that St Andrews is at its landscape capacity, that no major expansion should take place and that the landscape setting of St Andrews is crucial to its character. The plan substantially degrades these views.

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

A Green Belt preserving views needs to be established urgently to stop developers trying repeatedly to encroach into the surrounding area.

Response:

The detailed boundary of the Green Belt is shown in the draft St Andrews and East Fife Local Plan. It has been delineated to provide for development need and this boundary will be defensible in the long term.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

More affordable housing is required. However allocating 45% is likely to be an over-estimate of the actual percentage that would be built.

Response:

The percentage requirement for the St Andrews housing market area has been revised in the Finalised Structure Plan. This was done in response to the publication of PAN 74 and also to the results of the updated Housing Needs and Affordability Study which identified a need for just under 1,500 new affordable houses in the St Andrews housing market area.

Action:

Change percentage requirements in Finalised Plan Policy H4 (Draft Plan Policy H5).

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

A new secondary school in North Fife is required.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The allocated housing would also only remain affordable for the first buyers and these buyers are likely to sell at a high profit.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

A scheme for affordable houses for a mix of rent and buy is required to permanently affordable.

Response:

Agree. Any affordable housing should involve a mix of tenures and house types to ensure mixed and balanced communities. This is made clear in the Finalised Structure Plan, and Supplementary Guidance on Affordable Housing. Retention is an important issue.

Action:

Taylor, A - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Why does the town need so many new houses? How has this figure been reached?

Response:

Housing need figures calculated by Fife Council using Scottish Executive specified methods, which is the common methodology throughout Scotland.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Why does Local Plan Policy E21 not set out the Green Belt policies put forward in the Scottish Office Green Belt Circular of 1985? The boundaries in the Local Plan are badly presented and it is almost impossible to see the inner and outer boundaries. Why are the contours not shown?

Response:

The detailed Green Belt Policy guidance referred to is contained in the Draft St Andrews and East Fife Local Plan which complies with Government guidance, and clearly shows boundaries. Contours are often omitted to avoid clutter. The Scottish Executive has issued a Scottish Planning Policy (SPP) note on Green Belts which updates Circular 24/1985. This has been taken into account in finalising both the Structure Plan and the St Andrews and East Fife Local Plan.

Action:

Phillips, Carol-Ann - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Objects to the housing proposed at St Andrews. Concerned that this will destroy the character of the town. There is not the demand for such a large number of houses. Concerned at the infrastructural impact of this proposal.

Response:

Objection noted. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. Appropriate infrastructure and facilities will be in place to facilitate development planned. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

The Green Belt should be a full Green Belt encircling the town. How else can the wonderful setting of St Andrews be preserved for the future?

Response:

Disagree. The detailed boundary of the Green Belt is shown in the draft St Andrews and East Fife Local Plan. It has been delineated to provide for development need and this boundary will be defensible in the long term.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

Recognises the Council's need to grow Fife and indeed applauds the desire to attract employment to the Central Fife area providing housing also in Central Fife.

Response:

Support noted.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Acknowledging the complexity of a consultation process which has been undertaken, it is considered that the time allocated for submitting comments on plans that are so important and so detailed, has been seriously inadequate.

Response:

Concerns noted. Each document provided information about its purpose however comments re inter-relationship of documents will be given further consideration. The documents were in the public domain from late November 2004 onwards. The public consultation period was in excess of the statutory requirement and this was further extended to take account of comments submitted well beyond the closing date. The comments form was intended to assist consultees ensure comments were made in relation to the appropriate plan and to assist Fife Council to aid clarity and avoid ambiguity.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Considers that the destruction of St Andrews would do little to encourage inward investment to Fife and not provide the impetus to regenerate the towns of Central Fife.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. Proposals for St Andrews can contribute to the wellbeing of Fife as a whole. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

University of St Andrews, Principal's Office, Watson, Derek A - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

The University of St Andrews supports the Council's proposed strategy to develop St Andrews as a World Class destination and develop it as an economic driver for the whole of Fife. This is consistent with the University's objective of enhancing its international competitiveness in higher education and research.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Supports the proposed housing land strategy. Suggests that to meet needs to the period of 2026 the appropriate figure should be 1800 houses rather than the lower figure in the stated range.

Response:

Support noted. Partial support noted.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Although the principle of a Green Belt around St Andrews was contained in the Approved Structure Plan, circumstances have moved on with the review of Green Belt policy currently being undertaken by the Scottish Executive. Considers there are other planning mechanisms to set an appropriate balance between growth and environmental protection of the setting of the town without imposing a Green Belt and in the circumstances consideration should be given to rescinding the Structure Plan policy. There is no issue of coalescence between St Andrews and other settlements. In the event that the Green Belt is put in place the Structure Plan should set out the perimeters for defining the critical views to and from the historic core. These should be related to circular 24/1985. The Report of Survey provides no explanation as to the purposes of the Green Belt beyond commenting that its aim is to protect views and landscape setting of the town. What is intended by the phrase "the option of retaining green belt of controls over institutional growth to help ensure the highest standards of new landscape... in Local Plans (paragraph 4.2.6). The Green Belt has defined purposes that do not appear to accord with this statement. Clarity is required whether the reference to institutional growth is a reference to the University's core activities and if so this is a matter of concern if it may inhibit its ability to deliver teaching, research or residential requirement set out in its Estate Division.

Response:

The detailed boundary of the Green Belt is shown in the draft St Andrews and East Fife Local Plan. It has been delineated to provide for development needs and this boundary will be defensible in the long term. The Scottish Executive have recently issued a Scottish Planning Policy (SPP) note on Green Belts which updates Circular 24/1985.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

45% requirement for affordable housing is not justified. PAN 74 on Affordable Housing suggests 25% as a benchmark with a higher percentage only in exceptional circumstances. Such a high requirement may result in poor quality housing and with it restrict potential for other planning gain.

Response:

The Finalised Structure Plan and Supplementary Guidance on Affordable Housing have been modified in the light of PAN 74, which was published after the drafts were approved. Percentage requirements are now consistent with PAN 74. Draft Plan Policy H5 now Finalised Plan Policy H4.

Action:

Change percentage requirements in Finalised Plan Policy H4 (Draft Plan Policy H5) (and Policy AH1 of the Supplementary Guidance).

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Suggests that it would be appropriate for this peripheral distributor road which would be integral to the western expansion area to be listed under strategic proposals in Proposal PT2. The provision of the distributor road as part of the development would be consistent with the objectives set out in Policy T1.

Response:

Comments noted. Proposal PT1 of the Finalised Structure Plan (Draft Plan Proposal PT2) lists key strategic transport proposals for the Plan period, with further projects identified in the Action Plan, Schedule 3 and in relation to the St Andrews Strategic Development Area.

Action:

Central St Andrews Residents Alliance, Middleton, David - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Fife's population is stated as 370,000 and still expanding. Please compare this figure with that given in paragraph 3.32. Agrees with the ten challenges facing Fife.

Response:

The quotation (of paragraph 1.2) refers to the Vision for 2026 and this is consistent with paragraph 3.32. Support for challenges facing Fife noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Re: the statement 'Fife has a well educated work force' in the Draft Plan. This is not necessarily so particularly in the poorer areas of Central Fife. The statement ought to be justified. Fife Council should concentrate on school facilities and teacher quality in the more deprived areas.

Response:

Fife Council with partners continue to further training and education opportunities. The Fife Economic Development Strategy "Growing Fife's Future" sets out a number of actions in this regard.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

The strategy to increase employment opportunities and reduce economic disparities should be based on the availability of good education. Priority should be given to educating the unemployed so that they are able to escape the benefit culture to be found in many of the less prosperous areas.

Response:

This is part of the proposed way forward.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Tourism

Comment:

In terms of St Andrews being a World Class destination it is considered it is already a world class destination and throwing money at it will do nothing unless Fife Council first consults the residents and gains support for the plans.

Response:

St Andrews has many fine qualities which attract tourists, however there is always scope for improvement. Specific proposals which emerge will be the subject of public debate.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

The proposal to guide inward migration to Mid Fife and reverse outward migration is a worthy one but surely the problem is not a shortfall in population in Mid Fife but a shortfall in jobs. Providing jobs is not necessarily the only answer as these may be taken up by inward migration and still leave the present unemployed group unemployed because they are unwilling or unable to be part of a reliable and qualified workforce.

Response:

Support for strategy noted. The Finalised Structure Plan seeks to promote jobs in Mid Fife but it is unrealistic to expect that all commuting will cease.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

Strongly agree with the principle to support the growth in economy of East Central Scotland.

Response:

Support noted.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

One of the biggest inputs into supporting growth must be the transportation system within Fife. The strategy is unimaginative and does not recognise that we are living in the 21st century. What is meant by multimodal crossing at Queensferry? It is not defined in glossary. The concept of using RAF Leuchars for civil commercial flights except for occasional VIP business jets is untenable.

Response:

The Finalised Structure Plan has been prepared in close partnership with Transportation Services. It has been informed by strategic transportation modelling and by wider studies such as SESTRAN Integrated Corridors Study, to ensure that the transport needs of Fife and South East Scotland are fully considered. The Plan must consider the potential for a multi-modal crossing which is capable of carrying a range of transport modes - see Glossary. Fife Council will work in partnership with RAF to review any opportunities at Leuchars.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

We understand that the University of St Andrews is required to have a master plan for the structural forward planning base for any future building. Has this plan been drawn up and should it be contained in the Structure Plan?

Response:

Specific sites are allocated through the St Andrews and East Fife Local Plan. For strategic land allocations master plans will be prepared and the community consulted.

Action:

No Change

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Central St Andrews is no longer a sustainable community due to long term residents being outnumbered by transient population of university students.

Response:

This is detailed issue which should be addressed via the Area Local Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

It is essential in St Andrews that affordable houses must be retained as affordable in perpetuity.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

No Change

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

The proposal in Paragraph 1.14 that some of the development pressure will be accommodated in an expanded St Andrews is not acceptable except for meeting needs for affordable housing.

Response:

Concerns noted.

Action:

No Change

Comment No: 12

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Policy SS1 makes no mention of a Tay Bridgehead school which is long over due. This would also reduce the need to travel. Paragraphs 3.3 - 3.6 of the Draft Plan appear to give the lead in everything to developers and it is suggested that this is the wrong way to go about things as Fife Council should draw up plans.

Response:

Policy SS1 is not area specific. Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Suggests that the University of St Andrews research and development (R+D) takes place in central Fife where there is high unemployment and plenty of space for light industrial units and staff housing. Why can't St Andrews Research and Development take place in Glenrothes where there are currently high tech businesses.

Response:

The preferred location for R+D is in the area of the University Campus however, downstream manufacturing employment has the potential to draw upon the skills of the labour force in Mid Fife. The Finalised Plan emphasises the importance that science and technology can make to the Fife economy.

Action:

No Change

Comment No: 14

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

St Andrews retail development plans are being wrecked by the "studentification" of the town centre which leads to the proliferation of licensed premises, fast food outlets, coffee shops etc and the closure of traditional shops.

Response:

Concerns about, and suggested reasons for change are noted. Statutory planning for town centres is guided by Scottish Executive guidance (NPPG8/SPP8) and planning law framework. Policy S1 aims to promote a diversity of uses, based on retailing. Agree it is desirable to retain distinctiveness and character. The St Andrews and East Fife Local Plan will address this in detail.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

Strongly disagree with the need for St Andrews to accommodate a further employment land to grow the economy, because of constraints of an effective Green Belt and the sea. Employment should be grown in Central Fife.

Response:

It is intended that the benefits from the St Andrews World Class concept will bring long term benefits to the town and also to the rest of Fife. The Green Belt which is delineated for the first time in the Area Local Plan, is designed to accommodate new development and provide a long term defensible boundary. It should be noted that most of the land allocated for development in the Finalised Structure Plan is located in Mid Fife.

Action:

No Change

Comment No: 16

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

In Policy ENV1 the statement that a Green Belt will be identified is not good enough. The siting of the Green Belt and its boundaries must satisfy the residents and not be manipulated. An effective and appropriate Green Belt must be established in perpetuity.

Response:

Disagree. The Structure Plan provides strategic guidance to be interpreted in detail in Local Plans. The detailed boundary of the Green Belt is shown in the St Andrews & East Fife Draft Local Plan. It has been delineated to provide for development need and this boundary will be defensible in the long term. Further consideration will be given to the Green Belt boundary in finalising the Local Plan.

Action:

No Change

Comment No: 17

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Within the Action Plan there is no mention of the Tay Bridgehead school which must be a priority in the Structure Plan.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Roads

Comment:

Schedule 3 of the Action Plan mentions a light rapid transit system for Dunfermline. Why is St Andrews not mentioned in relation to this, transport options to rail network and park and ride?

Response:

Proposal PT1 of the Finalised Structure Plan (Draft Plan Proposal PT2) lists strategic transport proposals including park and ride at St Andrews and further consideration of transport link options to the rail network. The latter will be addressed through the review of the Local Transport Strategy.

Action:

No Change

Comment No: 19

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Coast

Comment:

Of the nine relevant points in Paragraph 2.4, only one refers to St Andrews and that relates to tourism. No need to repeat the obvious and accepted facts.

Response:

St Andrews is not located within the Coastal Regeneration Zone (see Key Diagram) which stretches from Rosyth to Leven.

Action:

No Change

Comment No: 20

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Coast

Comment:

Paragraph 2.43 mentions increased risks to existing development and coastal defences. This is relevant but does not appear to be covered elsewhere, why not?

Response:

Item referred to is a summary of the guidance in NPPG13. Policies on coastal areas are contained as Core Local Plan policies and will be included in the emerging Area Local Plans.

Action:

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Population Growth

Comment:

The statement "within Fife there is a continued decline in population in Mid Fife and an increase in West and Mid Fife" this needs an explanation as Fife Council cannot have it both ways. Paragraph 3.20 sounds like population manipulation and needs an explanation. Let us concentrate on a well educated home bred population to satisfy Fife's requirements. Better support for young families and better health care are effective ways in increasing the population.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth. Councils such as West Lothian, East Lothian and Stirling are all projected by the GRO (General Register Office for Scotland) to have population growth over 9% in the period up to 2018.

Fife is now coming under the influence of the Edinburgh City Region. Between 2000 and 2004 the population of Fife has grown by over 6,000. This level of growth easily meets the 5% aspirational population target set for Fife over a twenty year period. Recently published 2004 based population projections show Fife growing by 9.1% over the next twenty years.

Action:

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Population Growth

Comment:

In Paragraph 4.9 figure 4.1 the St Andrews population is given as 16,904. Where is this figure taken from? The range of population increase from the census date to the present time is 5% which if continued to 2026 would result in a population increase of 25%. This bears no correlation with any of your population projections where s Fife Council's source?

Response:

The population of St Andrews was incorrectly given as 16,904 and this may be partly due to double counting of students. The 2001 population of St Andrews is estimated to be 14,695. This derives from the census figure of 14,249 plus an error in the census figures which placed 446 students living in Halls of Residence into Strathkinness. This figure may also include an undercount in the number of students, but this has not been confirmed with the GRO.

In 2005 the GRO produced population estimates for settlements in Scotland based in 2003 data. The Population of St Andrews was given as 14,420. The GRO has acknowledged there may be an undercount and will publish a revised figure in its 2004 estimates.

Action:

No Change

Comment No: 23

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: MSHA - St Andrews

Comment:

With reference to developers making appropriate funding contributions, St Andrews residents a great sense of unease that developers "get away" with things and that it is time that this was stopped.

Response:

Finalised Plan Policy DC1 and Proposal DC1 seek to ensure that developer contributions are secured to address and shortfalls in community infrastructure related to development proposals.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Developer Contributions

Comment:

Developer contributions is a very contentious area and a balance must be struck between funding and the planning disadvantage of a proposed development. It is considered developer contributions are an open invitation for bargains and deals to be struck between the councils and developers. All plans should be based on nil developer contribution.

Response:

The Finalised Plan sets strategic policy approach. Detailed discussions will follow once the process has been advanced via Area Local Plans, Master Plans and development briefs. It would be Impossible to implement the Structure Plan proposals without developer contributions.

Action:

No Change

Comment No: 25

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Public Transport

Comment:

25,000 residents commute out of Fife daily with 11,000 commuting in. Can individual local authorities not be mandated by the Executive to reduce commuting levels?

Response:

The Road Traffic Reduction Act (1997) requires local authorities to produce a Road Traffic Reduction Report, however, the legislation does not require local authorities to set targets for road traffic reduction, if reasoned arguments can be provided. The Finalised Structure Plan seeks to reduce the need to travel by seeking the provision of land to create more employment opportunities in Fife.

Action:

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Town Centres

Comment:

It would be useful if you could abolish the zone area detail renting rate per square foot for St Andrews. Although vacancy rate in St Andrews suggests a strong latent demand for premises. This statement however hides a rapid turnover of tourism related outlets. Have you surveyed shop keepers who have moved on after short rental periods to find out their reasons for moving? We would suggest that this is a worthwhile exercise. Paragraph 5.197 items 1 and 2 are self evident and already exist.

Response:

Town centre perception studies have been undertaken in St Andrews in recent years. These assessed the views of businesses including retail businesses operating at the time of the survey and can be read in local libraries and at www.fifedirect.org.uk/developmentplan. Issues of rates and rents are outwith the scope of the planning system.

Action:

No Change

Comment No: 27

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Population Growth

Comment:

Paragraph 5.249 expects Fife population expected to grow by 6000 from 352,000 to 358,000 by 2026. Please justify these figures in relation to your figures given in paragraph 1.2 and 3.32. How can this statement be balanced with the statement that additional inward migration may require 8000 new homes, 1000 of which would be in St Andrews and East Fife. Does this mean that there may be an additional 1000 homes in the St Andrews housing market area on top of those proposed elsewhere?

Response:

The figures are justified by the Structure Plan strategy which seeks to take a pro-active approach to growing the Fife population rather than going along with existing trends which are not producing positive results.

Action:

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Housing Land Requirement

Comment:

Paragraph 5.254, Additional Demand Allowance. Is this above all other requirements? Paragraph 5.256 and fig. 5.52 show a requirement for 4000 houses in the St Andrews HMA by 2026. Impression is that unless Fife Council intervenes, non-essential housing demand will exceed supply and the Green Belt will be degraded or disappear. During the consultation there was no firm commitment on housing requirements.

Response:

Additional demand allowance provides an element of flexibility of an additional 10% above housing need. The housing requirement for St Andrews Housing Market Area is aimed at meeting primarily locally-generated needs over the period 2006-2026. Development proposals will be progressed in line with Development Plan policy, which provides for a Green Belt at St Andrews. The draft Structure Plan and draft Area Local Plan were published for public consultation in Spring 2005, to allow for consideration of community and stakeholder opinion.

Action:

No Change

Comment No: 29

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Public Transport

Comment:

Strongly support a direct rail link to Edinburgh airport.

Response:

Support noted. This specific proposal relates to development in City of Edinburgh which is being progressed and specific reference has been deleted from the Finalised Plan.

Action:

Delete specific reference to direct rail link to Edinburgh airport.

Comment No: 30

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Renewable Energy

Comment:

The comment in paragraph 6.14 "there are various existing...in the Structure Plan period" is not good enough. University of St Andrews has a world renowned status in green energy research and Fife should be developing this.

Response:

Statement of fact is sufficient for Report of Survey.

Action:

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Waste Management

Comment:

Fully supports these proposals.

Response:

Support noted.

Action:

No Change

Comment No: 32

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Green Belt

Comment:

Re: Paragraph 6.115 Green Belt objectives and further developments must be reconciled, however should not be at the expense of the Green Belt or its boundary.

Response:

The Green Belt boundary will be defined through the Local Plan process.

Action:

No Change

Comment No: 33

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: MSHA - St Andrews

Comment:

Re: Report of Survey paragraph 6.116, the issue for St Andrews and the extent that it should grow over a long time scale, apart from affordable housing which is an accepted need, there should be no further growth in the town's housing stock except in opportunity sites within the town boundary as presently defined.

Response:

Concerns noted.

Action:

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Natural Environment

Comment:

Policies in text of Draft Plan on nature conservation of countryside are broadly accepted in

principle.

Response:

Support noted.

Action:

No Change

Comment No: 35

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Design Quality

Comment:

Supports traditional styles and designs for residential properties. Modern designs have no place in St Andrews.

Response:

Support noted. Each proposal would be considered on its merits. Draft Plan Policy ENV3 will be included in Area Local Plans.

Action:

Draft Plan Policy ENV3 will be included in Area Local Plans.

Comment No: 36

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Forestry

Comment:

CSARA fully accept the Indicative Forestry Strategy.

Response:

Support Noted.

Action:

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Infrastructure

Comment:

With regard to Chapter 7 in the event that the population is increased it is essential that there are additional medical practices, schools, libraries and recreational facilities.

Response:

Chapter 7 refers to the Area Local Plan. The Finalised Structure Plan makes it clear that the appropriate level of infrastructure and service provision to support new development will be provided timeously in a planned manner via Local Plans, Master Plans and development briefs.

Action:

No Change

Comment No: 38

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Consultation

Comment:

Overall the period available for consultation was inadequate and it is considered that at least three months would be a more realistic time scale. Groups and individuals have found that the huge amounts of information contained in the various plans need to be examined extremely closely if we are able to satisfy ourselves as to what and is not acceptable in the plans and so that ultimately we can make constructive comments. We would insist that you listen to the residents of St Andrews' comments, suggestions and wishes in refining your plans.

Response:

Concerns noted. Each document provided information about its purpose however comments re inter-relations help of documents will be given further consideration. The documents were in the public domain from late November 2004 onwards. The public consultation period was in excess of the statutory requirement and this was further extended to take account of comments submitted well beyond the closing date. The comments form was intended to assist consultees ensure comments were made in relation to the appropriate plan.

Action:

No Change

Comment No: 39

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Report of Survey

Subject: Population Growth

Comment:

Nowhere in the Structure Plan do you give the source for your population figures.

Response:

The background information is contained in the Report of Survey, which indicates sources of information.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

In terms of item 3 what is the Council doing to encourage trade apprenticeships. These add a considerable burden to employers who are often not prepared to show their cost. There is the result of an influx of tradesmen form outwith St Andrews would it not be better if local employers were able to satisfy the demand. Item 4 to develop a broader range of facilities and activities is laudable but sounds like pie in the sky.

Response:

The issue of apprenticeships is not a strategic planning issue. Concerns about the practicality of delivering of services is noted. The Finalised Structure Plan makes a positive commitment to achieving this.

Action:

No Change

Comment No: 41

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Leisure Facilities

Comment:

You need to concentrate on for example a 50m swimming pool, an ice rink big enough to take major championships.

Response:

Noted. However this issue is more appropriately addressed by Local Plans.

Action:

Kilmister, Sally - Tayport

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: City Region Planning

Comment:

Fife Council should be working much more closely with Dundee City Council over the allocation of land for housing in the Tay Bridgehead area. Quite correctly the Fife Structure Plan leads on the desirability of Brownfield sites and it is considered that such sites are available in Dundee. Using these sites would avoid the use of greenfield sites in Tayport.

Response:

The housing land allocation for the Tay Bridgehead area has been reduced in the Finalised Structure Plan. The proposed scale of development is appropriate to meet the projected requirements for the period to 2026. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. The views of Dundee City Council have been taken into account in drafting the Finalised Structure Plan.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Draft Plan specifically states that development proposals must not create or exacerbate road safety problems and it is considered that the development of areas in Tayport would not be consistent with this policy.

Response:

Appropriate transport improvements will be identified to address the impact of development proposals as part of the Area Local Plan and masterplan process.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Design Quality

Comment:

Energy efficient housing should be made a top priority. The pressure needs to be placed on developers to come up with radically new designs to achieve high levels of energy efficiency.

Response:

The issue is being addressed via other legislation and initiatives/strategies. Fife Council is supportive of actions to improve energy efficiency. Design Quality Policy which addresses this problem has been relocated in the Area Local Plans.

Action:

Draft Plan Policy ENV3 will be included in Area Local Plans.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Proposals for a large number of houses in Tayport is directly in contradiction with the strategy to improve Fife's environment by protecting and enhancing the character and distinctiveness of Fife's towns and villages.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. This allocation is a reduction from the consultative draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Sustainability

Comment:

The proposed development of new greenfield sites in Tayport appears to be contrary to Fife Council's stated intent of promoting sustainable development by favouring Brownfield sites and developing beyond local infrastructure capacity.

Response:

Whilst Fife Council strongly promotes the use of brownfield sites, in certain areas necessary new development can only be accommodated by the release of greenfield land.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

The opening of a new station at Wormit should be given a higher priority and not regarded as merely an aspirational proposal. It is considered that such initiatives need to precede new housing development rather than being developed once the housing is built.

Response:

The commitment to Wormit Station is contained in Proposal PT1 of the Finalised Structure Plan. This will be progressed through the Local Transport Strategy and Area Transport Plans.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Would like to see improved transport links being given a much higher priority in particular a rail connection to Rosyth and a link to Edinburgh airport.

Response:

See Finalised Plan Paragraph 3.58 onwards and Finalised Plan Proposal PT1 for details of these issues. Reference to airport deleted as this is being progressed.

Action:

Swankie, Ian - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

There is no justification for the stated objective of growing the population of Fife by 20,000.

Response:

The Finalised Structure Plan sets out the strategy which justifies the objective of growing Fife's population.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

There is no indigenous demand in St Andrews for new housing other than affordable housing. The approved 2002 Fife Structure Plan had a zero requirement for new housing until 2011.

Response:

Provision of housing proposed for St Andrews for 2006-2026 in Finalised Plan Proposal H2 is aimed at meeting locally-generated needs over the period. The calculation of the housing land requirement is set out in the Report of Survey. The Approved Structure Plan was informed by the 1998 Strategic Study. Significant changes have taken place in the interim, which require the provision of land for new development and the emerging Development Plan is addressing these requirements.

Action:

Housing allocation reduced from 1,000 - 1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Steps must be taken to ensure that affordable housing is affordable and should include a very high percentage of houses for rent, i.e. it is suggested that this should be set at 75% plus. In addition developer financed affordable housing is not an acceptable means of achieving the affordable housing requirements.

Response:

It is considered that the approach being taken in the Finalised Fife Structure Plan and Supplementary Guidance on Affordable Housing will facilitate the provision of affordable housing. The updated Housing Needs and Affordability Study identified that 65% of the affordable housing provision should be social rented stock. The provision of affordable housing through the planning system is a legitimate means of contributing to meeting the need for affordable housing. This is supported by the Scottish Executive's planning policy. Many other local authorities across Britain are using this approach.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The infrastructure of St Andrews cannot cope with an additional 2000 houses.

Response:

It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned. Draft allocation for St Andrews of between 1,000 and 1,800 houses set at 1,200 houses.

Action:

Allocation for St Andrews set at 1,200 houses.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The unique character of St Andrews would be destroyed by the development of 2000 houses and it is possible that the external demand for housing might dry up as St Andrews becomes less attractive.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

The original Green Belt boundaries should be adhered to. No justification has been given for altering these boundaries.

Response:

The boundary of the St Andrews Green Belt is delineated for the first time in the draft Local Plan. The Green Belt is designated to provide for necessary development and secure other policy objectives. The Green Belt has been delineated in a manner consistent with Structure Plan policies.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Any additional non-affordable housing developments in the St Andrews area should be located at Blebo Craigs.

Response:

Noted. The detailed allocation of housing sites is not a Structure Plan issue and is more appropriately addressed by the St Andrews and East Fife Local Plan. Comment will be considered in this context.

Action:

Robertson, M - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Why is it necessary to build expensive private housing in order to meets the needs of affordable housing?

Response:

The scale of the affordable housing shortage in Fife is such that a variety of mechanisms are required to address it. Fife Council is actively pursuing a number of these. In such situations, however, the planning system can make a contribution. This approach is supported by the Scottish Executive. Many other local authorities throughout Britain are using this approach. Private housing will take the form of a variety of types.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Why can't you build "Council housing"?

Response:

This is not a land use planning issue. Current Fife Council policy is not to build Council housing, due to right-to-buy legislation, but this may be reviewed in due course.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Why can't you build affordable houses that will be affordable in perpetuity?

Response:

Current Fife Council policy is not to build Council housing due to right-to-buy legislation, but this may be reviewed in due course. More generally, agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the Council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Check out what the Lake District has done to overcome this.

Response:

Noted. Fife Council's approach to meeting the shortfall for affordable housing has taken into account the approaches and experiences of a wide range of range of authorities throughout Britain, including the Lake District National Park authority.

Action:

Dr C Jones & Ms K McSladdy, - Boarhills, St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

The Green Belt is extremely important to contributing to the pleasure of living and working in St Andrews. Any erosion of this must be resisted.

Response:

The boundary of the St Andrews Green Belt is delineated for the first time in the draft Local Plan. The Green Belt is designated to provide for necessary development and secure other policy objectives. Green Belt has been delineated to provide a boundary which will be defensible in the long term.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The planned increase in housing will create implications for traffic congestion which is already alarming specially near schools.

Response:

Traffic congestion and location specific issues will be addressed via the Local Transport Strategy and Area Transport Plan.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Concerned about the class sizes at Greyfriar's Primary School and the ever increasing number of pupils at Madras College. It is essential that school capacity issues are addressed.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

The lack of a rail link to St Andrews is a major concern and should be addressed in the Plan.

Response:

Proposal PT1 of the Finalised Structure Plan gives support for further consideration of transport link options for St Andrews to the rail network, to be addressed through the Local Transport Strategy.

Action:

Harding, Judith - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is accepted that the basic premise of developing Fife will not happen unless Fife Council achieves its aim of attracting jobs to areas where there are currently only low paid jobs. It is considered that this is obviously true of St Andrews where most working citizens are commuting to better paid jobs or have low paid jobs in the town, often part time.

Response:

The Finalised Structure Plan and other Fife Council strategy documents make it clear that the Council is seeking to increase the number of employment opportunities in Fife. There is scope for St Andrews to play an important role in encouraging new employment opportunities.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The proposal to allow developers to build 2000 houses is very short sighted as these will not be afforded by people who work in St Andrews and will lead to a decline in the shopping centre.

Response:

It is intended that the new housing would provide for the predicted needs especially to seek or provide the affordable housing required. Additional population should support the town centre.

Action:

The allocation of new houses has been reduced from 1,000 - 1,800 in the Draft Plan to 1,200 in the Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The idea that St Andrews can live off golf tourism has been exploded by the example of St Andrews Bay development, which is an ugly white elephant, which was promoted by Fife Council as it would bring employment. In fact, employees are often on short term contracts and are from abroad.

Response:

St Andrews Bay is still being developed and it is premature to draw any conclusions about the project.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Concerned that the Plan does not make provision for the original Green Belt as approved and it seems likely that development will be allowed to progress towards the south of the town. In addition there is concern that the Council spokesman at the meeting on 20th April only supported the preservation of the medieval skyline as viewed on the approaches to St Andrews. Suggests that Fife Council could be considering building all the way up to the top of the ridges which surround the towns. Future generations would not thank us for being unable to preserve one of the last medieval layouts of a Scottish burgh.

Response:

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries.

Action:

Policy and text amended.

Mudie, E J - Strathkinness, St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Question the figures quoted for the population of St Andrews and the proposal to increase the population to 17,000 by building 2000 houses over the life of the plan.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Councils such as West Lothian, East Lothian and Stirling are all projected by the GRO (General Register Office for Scotland) to have population growth over 9% in the period up to 2018.

Fife is now coming under the influence of the Edinburgh City Region. Between 2000 and 2004 the population of Fife has grown by over 6,000. This level of growth easily meets the 5% aspirational population target set for Fife over a twenty year period. Recently published 2004 based population projections show Fife growing by 9.1% over the next twenty years.

Action:

Demographics work has been updated, the details of which are contained in the Report of Survey.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Question the need to develop St Andrews as a world class tourist destination. It is considered that the St Andrews economy is driven by the University and the Royal and Ancient and it is unlikely that local authorities can produce strategies to extend this as they are outwith a public orbit. It is suggested that it would be more realistic if the Plan acknowledged that failure to protect the town's built environment and natural heritage against inappropriate development will undermine efforts to enhance its appeal as a world class place to visit.

Response:

The policies in the Structure Plan and the Area Local Plan can contribute to the enhancement of the role of St Andrews as an economic driver for Fife. The planned development will ensure that the long term development of St Andrews is carefully controlled to prevent damage to the built environment and natural heritage.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Has Planning identified a relationship between the overall shortfall for affordable accommodation in St Andrews Housing Market Area and the growth of the University? At the moment the University is not investing in additional accommodation as distinct from rebuild and replacements.

Response:

The updated Housing Needs and Affordability Study did take account of the influence of the University. The Structure Plan's approach to affordable housing is informed by the Study.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Should Draft Plan Policy H6 be interpreted as the University has an obligation in the St Andrews Housing Market Area to provide the accommodation arising from its own expansion plans.

Response:

This is not a strategic planning issue and is more properly addressed by the St Andrews and East Fife Local Plan. Comment will be considered in that context. However Policy H6 has been deleted although a text reference to affordable housing and non-residential development has been retained.

Action:

Delete Draft Plan Policy H6

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

St Andrews town centre can hardly be classed as world class with so many charity shops and coffee shops.

Response:

The aim is to raise the profile of the town centre and to enhance its quality to maintain and develop its World Class status.

Action:

Ryan, Bruce M - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Entirely agree that Fife Council should not follow a Laissez Faire Policy and that it should seek to guide development along sensible, sustainable and environmentally aware paths.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Concerned that the planned growth of housing in St Andrews will have significant impacts on internal traffic movement in the town, on the provision of education, and, on the landscape, especially of the Green Belt and the Southern hillside.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. The boundary of the Green Belt has been delineated to provide for development yet protect the surrounding landscape.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Question the desire to grow Fife's population. What is the driver for the proposals to build housing in St Andrews and elsewhere? It is understood that there is some natural population growth but why does Fife need more? It is obvious that if population is growing it cannot be in decline!

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Councils such as West Lothian, East Lothian and Stirling are all projected by the GRO (General Register Office for Scotland) to have population growth over 9% in the period up to 2018.

Fife is now coming under the influence of the Edinburgh City Region. Between 2000 and 2004 the population of Fife has grown by over 6,000. This level of growth easily meets the 5% aspirational population target set for Fife over a twenty year period. Recently published 2004 based population projections show Fife growing by 9.1% over the next twenty years.

Action:

Demographics work has been updated, the details of which are contained in the Report of Survey.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

It is not clear where people coming into Fife would migrate from. It is assumed that they would come from other parts of Scotland and this would either exacerbate decline of population in communities in rural Scotland or use Fife to house Edinburgh and Dundee's excess population. Incomers from these areas are unlikely to join Fife's rural communities and are therefore most certain to move to Fife's larger settlements as witnessed by the expansions of Dunfermline, Glenrothes and the smaller expansion of St Andrews.

Response:

The Finalised Structure Plan is planning for growth in a number of locations and it is considered that the larger scale expansions should take place in existing larger settlements.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Delighted to see that Fife Council is taking seriously the twin needs of building affordable housing and keeping it affordable.

Response:

Support noted.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Accept that we tend to live in smaller units and that the nuclear family is less common. Therefore understand that there is a requirement to increase the number of "front doors" even if St Andrews population wasn't to increase. Since the population is likely to increase by 1.5% then are increase of 2% (to take account of household size changes) might be justified. However, the scale of expansion that is proposed is not justified, is unwelcome, and, is completely wrong for St Andrews.

Response:

Concerns noted. The scale of development proposals for St Andrews is based on the calculation of the housing land requirement and at meeting locally-generated needs over the period 2006-2026. The revised allocations are set out in the Finalised Plan Proposal H2.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Fully support the approach to environmentally aware power sources which is highly desirable.

Response:

Support noted.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Waste Management

Comment:

Support environmentally aware waste disposal, especially recycling.

Response:

Support noted.

Action:

Mitchell, Malcolm M - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Disappointed to see the change of direction by Fife Council from the approach taken in the 2002 approved Structure Plan. It is considered the proposed large scale development for St Andrews is wholly inappropriate and will spoil one of Scotland's finest towns forever.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. The boundary of the Green Belt has been delineated to provide for development yet protect the surrounding landscape.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Bowman, Eric - Strathkinness, St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is considered that there should be no housing in excess of five houses and definitely no large scale developments in Springfield.

Response:

The level of housing provision for Springfield is set out in the Area Local Plan.

Action:

Spackman, Anna - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The housing expansion planned for St Andrews appears not to be driven by demand but by Fife Council's desire to grow Fife. Much of the increase in housing in the area of St Andrews in East Fife is inappropriate to the existing demand and available resources. The population of St Andrews is an unknown quantity however it is known to consist of established residence and an increasing "floating population" of students. Nowhere in the Structure Plan is there any mention made of the student population or its impact on St Andrews. At present, St Andrews just maintains the balance between the demands made by University, holiday destination and a world famous golfing site. The physical core cannot cope with an enlarged population with residential demand.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. Housing need figures for St Andrews calculated by Fife Council using Scottish Executive approved methods.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

Out of town shopping centre complexes must be a non-starter for the St Andrews area.

Response:

The Finalised Plan aims to support and enhance town centres including St Andrews and it adopts a sequential approach. However, it is not possible to rigidly apply such a restriction in entirety and satisfy Scottish Executive guidance in NPPG8/SPP8. Guidance does allow retail development in other appropriate locations.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Fife Matters does not appear to address issues of existing demands. Its exploitative nature is demonstrated by its emphasis in expanding St Andrews as a holiday and leisure facility, encouraging shops and services which do not benefit a residential community. How many coffee shops can a town support at the expense of necessary shops? Business rates capable of being met only by multi-nationals will not enhance the world class status of St Andrews.

Response:

It is not intended that the future development of St Andrews town centre should be achieved at the expense of local residents. Business rates are set by the Scottish Executive, not by Fife Council.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The idea that the University of St Andrews can be a catalyst for research / lead employment is unproven and could be a risky strategy upon which to plan for an increased number of jobs.

Response:

This view is taken by the National Planning Framework, produced by the Scottish Executive.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Any expansion of St Andrews has to include consideration of services such as schools, medical provision and necessary shops. This is considered the existing provision and the road and transport services are inadequate. In addition the environment of the town, which is a major attraction for tourists, will be destroyed and its historic importance and visual beauty ruined. Small is beautiful in this instance and, if carefully maintained, will provide an attraction for residents and visitors.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. Road and transport issues are partly addressed in the Structure Plan and in Local Transport Strategy and Area Transport Plan. The Area Local Plan seeks to ensure that the planned growth will be achieved in a manner that retains/enhances the historic importance and the visual beauty of the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Built Environment

Comment:

Conservation regulations need to be strengthened and increased, not ignored as the plan appears to have done.

Response:

Policies on conservation issues are now contained in the Local Plans. The Scottish Executive is seeking more strategic and shorter Structure Plans and this is reflected in the Structure Plan.

Action:

Douglas, V L T - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

How can affordable housing space be found when developers are funding the building of executive housing?

Response:

Policy H4 of the Finalised Structure Plan (Draft Plan Policy H5) addresses this issue. Developers will require to comply with its provisions when submitting applications for residential development i.e. a proportion of each housing site (or an equivalent contribution) should be allocated for affordable housing.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Why did Fife Council stop inserting a limited clause in the deeds of council housing sold to tenants? This approach would prevent businesses from being run down and would have prevented speculators buying houses to let at inflated prices and in addition would have gone some way to allowing young people to buying affordable homes.

Response:

This is not a land use planning issue and therefore outwith the scope of the Structure Plan. However, Fife Council's policy on its own stock has been influenced by the implications of right-to-buy legislation, with which the authority must comply. The Council has applied for Pressured Area Status (suspension of right-to-buy) for the areas with the most acute shortages of affordable housing.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

It is not clear from Schedule H3 why St Andrews requires so much new housing. In addition it is not clear how the needs figure has been derived.

Response:

The scale of development proposals for St Andrews is based on the calculation of the housing land requirement and at meeting locally-generated needs over the period 2006-2026, as outlined in the Report of Survey.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

If St Andrews was at its landscape capacity in 1998, how has the landscape been changed to accommodate the additional proposed houses?

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

Action:

McAllister, Colin - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Some form of rail link to St Andrews is necessary in view of the existing and proposed needs of the town. A lack of a rail link is a major reason for congestion within the town. In addition there is a requirement for additional car parking provision within the St Andrews area.

Response:

Proposal PT1 of the Finalised Structure Plan (Draft Plan Proposal PT2) gives support for further consideration of transport link options for St Andrews to the rail network, to be addressed through the Local Transport Strategy. The issue of car parking is addressed via the Local Transport Strategy and Area Transport Plan.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Madras College is grossly overcrowded and this creates problems both in education and road traffic congestion. A new school at Newport on Tay would greatly reduce the problems associated with education provision.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

The proposed site for the hospital in St Andrews must be made accessible by public transport as at present it is remote from the centre and has no public transport links. It is suggested that the hospital should be re-sited to be centrally located area as possible in the town.

Response:

The need for a new hospital was addressed in the Fife Structure Plan (Approved 2002). The site is not a strategic planning issue. The Structure Plan states that a site would be identified and progressed by the appropriate Local Plan. The site proposed in the Local Plan is the one preferred by NHS Fife, and the new hospital will be served by public transport.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

If the proposed housing developments all take place the landscape setting of St Andrews will be ruined forever, thereby destroying what attracts tourists students and residents to St Andrews. It is considered St Andrews has already reached its landscape capacity. It is suggested that further developments, if necessary, should occur in some of the other surrounding communities which are more able to absorb a limited amount of expansion, such as Strathkinness, Dairsie and Pitscottie.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements. The allocation of development land in each of the areas mentioned is an issue for the Area Local Plan to address.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

St Andrews is ready at full capacity with golfers and other tourists in the Summer months. The only possible way to expand is in the Winter months. It is suggested this can be done by providing sporting facilities other than golf e.g. swimming pool, curling / skating rink, squash courts, badminton courts which would cater for major international events and would provide facilities for the people of the town.

Response:

Suggestion for increasing the capacity of St Andrews is noted.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

When pressure on fixed assets takes situation beyond its optimum then the diminishing return factor sets in and the set up becomes inefficient. St Andrews has reached the optimum in its availability of fixed assets and that before any increase in variable assets such as new housing are placed in the town. The fixed assets base should be extended. Investment should be made in a rail link, a multi-storey car park, a new secondary school in the area, and new leisure facilities prior to any new housing being developed.

Response:

It is not considered that St Andrews has reached its optimum size and that there is scope to provide additional infrastructure facilities to facilitate development planned.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Fife Council should also remember that St Andrews citizens are not a commodity to be exploited, but a community to be served, preserved and valued for the enormous contribution it already makes to the prosperity of Fife and which does not want to be destroyed by excessive development.

Response:

Concerns noted. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Craik, E M - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Strongly believe that St Andrews cannot accommodate the planned expansion and the population increase. Simply, the infrastructure is inadequate to cope.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Turner, Henry R - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

The proposed Green Belt does not take account of the landscape studies prepared by Tyldesley in 1997 and Grant in 2003.

Response:

Disagree. The boundary of the Green Belt delineated in the draft Local Plan takes account of the landscape setting of the town.

Action:

Room, Stan D - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The proposal to increase St Andrews by 1850 houses over the next twenty years will destroy the setting of St Andrews. In 1998 and 2002 Fife Council decided against further housing development in St Andrews and it is considered that there is no need at present for such a major change in policy.

Response:

The justification for the housing land requirement is contained in the Report of Survey. The nil requirement in the Approved Structure Plan, 2002 was informed by the 1998 Strategic Study. Significant changes have taken place in the interim, which require the provision of land for new development, including decreasing household size and the demand for affordable housing.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing and to facilitate a new link road for the town.

Any new development would be subject to policies in the Structure Plan and Area Local Plan that give full consideration to issues of landscape.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The necessity to provide 450 affordable houses is laudable and accepted however they have to remain affordable and not be sold off within ten to fifteen years at immense profit.

Response:

Support in principle noted. Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The council has a responsibility to institute and maintain regulations to prevent tenants or owners selling off affordable housing. Surely something similar can be worked out by the current government.

Response:

Support in principle noted. Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing. Right-to-buy legislation is a matter for national Government.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The proposal to turn St Andrews into a world class centre without regard to the impact on its residents is extremely dictatorial. St Andrews has always been a place of historic, religious, academic and golfing renown. It is considered that there is no need for developers, high flying tourism and advertising executives, the majority of whom have no local knowledge of the town or its residents, to have excessive influence over the future of St Andrews.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing and to facilitate a new link road for the town. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. Proposals for the future of St Andrews will not be formulated without local inputs.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

A further high school similar to Madras College is required. In addition a new and larger hospital is also required.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate. The issue of the hospital is being addressed via the Area Local Plan.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Finalisation of the Green Belt boundary should be addressed as a matter of priority in St Andrews.

Response:

The proposed Green Belt boundary is shown in the draft St Andrews and East Fife Local Plan and this will be finalised when the Local Plan is Adopted.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

The expansion of the University of St Andrews, in a manner suggested by the University Court, is a subject which should be addressed as a priority for St Andrews.

Response:

The Structure Plan is supportive of the role an expanded University can play in generating employment. However, the detailed land use issues should be addressed via the Area Local Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The argument that developers must be allowed approximately 1000 houses at higher costs to subsidise the construction of affordable houses is totally unacceptable as the impact on a local environment will be disastrous.

Response:

The scale of housing proposals for St Andrews is determined by the housing land requirement and is aimed at meeting locally-generated needs over the period 2006-2026. This is set out in the Finalised Plan Proposal H2. It is not driven by the provision of affordable housing, but Finalised Plan Policy H4 (Draft Plan Policy H5) seeks to ensure that any new development includes an element of affordable housing to meet local needs, in combination with Development Plan policies which protect the environment and landscape setting.

Action:

Room, Frances M H - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Object to the proposal to build up to 2000 houses in St Andrews as it is considered that this will have knock on effects on the existing traffic congestion.

Response:

The issue of increases in traffic is partly addressed via planning policies and partly via the Local Transport Strategy and Area Transport Plan.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

St Andrews has been world class for centuries and the proposed development would only detract from the dignity of the city.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing and to facilitate a new link road for the town. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The excuse that to provide affordable housing requires a large number of houses to be built to subsidise them is nonsense. Fifty years ago St Andrews town council addressed the issue and houses remained in council ownership for many years. It is considered finance should be found to do this again. Surprised that the Council should be seen to be co-operating with developers.

Response:

The scale of the affordable housing shortage in Fife is such that a variety of mechanisms are required to address it. Fife Council is actively pursuing a number of these. In such situations, however, the planning system can make a contribution. This approach is supported by the Scottish Executive. Many other local authorities throughout Britain are using this approach. Private housing will take the form of a variety of types. The issue of Council housing is not a land use planning matter. However, current Fife Council policy is not to build Council housing, due to right-to-buy legislation, but this may be reviewed in due course. The Council has applied for Pressured Area Status (suspension of right-to-buy) for the areas with the most acute shortage of affordable housing.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Fife Matters should provide more information about a new secondary school for the area, more information about the new hospital and should also provide information about the green belt.

Response.

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate. A new hospital is the responsibility of NHS Fife.

Action:

Saunders, C - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Green Belt for St Andrews should extend at least 5km from the town centre and have a presumption against any development.

Response:

Disagree. The boundary of the Green Belt delineated in the draft Local Plan takes account of the landscape setting of the town.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

St Andrews should not be expanded any further.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Housing developments should not be focussed on St Andrews.

Response:

The Finalised Structure Plan proposes the allocation of housing in a number of locations throughout Fife. See Finalised Plan Proposal H2.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is considered that medium scale growth in St Andrews could destroy it as a town and would not address the affordable housing shortage.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. Finalised Plan Policy H4 (Draft Plan Policy H5) seeks the provision of 30% of new houses built in St Andrews to be affordable which is a positive approach to address affordable housing shortage.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Fife Council's strategy of increasing the population of Fife by 5% over twenty years is unsustainable and would put unacceptable pressure on the environment and the quality of life in Fife.

Response:

It is considered that the planned population growth can be accommodated as set out in the Finalised Structure Plan. Demographics work updated to inform Finalised Plan are presented in the Report of Survey. Housing allocations set out in Finalised Plan Proposal PH2.

Action:

Housing allocations set out in Finalised Plan Proposal H2.

Balsillie, Colin - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The loss of commercial units in St Andrews cannot be countenanced. St Andrews depends on its students' population and the business that permeate from them. These businesses require premises to work from at affordable rates of rent. Fife Council should ensure that employment providing facilities are maintained and to remove them is not in the best interests of the town.

Response:

The site specification proposals a local planning issue, however, there are proposals for additional employment generating land to be allocated and targets are set in the Finalised Structure Plan Proposal PE1.

Action:

Grounds, DW - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The responsibility is the current generation is to ensure that they protect what is perceived as desirable and ensure that any development sensitive to that left by previous generations. In essence it is considered better is to proceed through evolution rather than revolution.

Response:

It is agreed that nothing should stay static and it is intended that change should be planned to ensure that it takes full account of what is in place.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Fife Matters does not appear to have a primary objective, but it is clear that the status quo is not sustainable hence the Plan has to have a vision for the future. In the short term there are issues that need to be addressed and these may fall within the remit of Local Government. However Fife Matters would appear to be driven by national/Scottish Executive diktat rather than by local needs. The agenda would appear to create a wish list for the future. If such a draft Plan is needed it needs to be narrow in terms of overall objective but widened to include other service areas not mentioned including in particular, education and health.

Response:

Fife Council is required to undertake forward planning taking full account of UK and Scottish Executive requirements and translate them into the local framework. Full account of all supporting infrastructure and service issues has been taken whilst preparing the Finalised Structure Plan and the Area Local Plans. It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The plan does not clearly indicate the assessment procedure adopted. Questions the need for the scale of development set out in Policy H3. Whilst housing waiting lists indicate there is a demand, this is not at the level identified in Fife Matters.

Response:

The proposed scale of development is considered appropriate to meet the projected requirements for St Andrews for the period 2006-2026. The Report of Survey outlines the calculation of the housing land requirement and justification for strategic housing allocations as set out in Proposal PH2.

Action:

Housing allocation in St Andrews reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The Strategy appears to consider housing provision as the catalyst for social and environmental change. It is considered that housing is part of a process to move populations, to increase Council Tax revenue and fund social change by housing developers. If this project is pursued in this manner, existing communities will be adversely affected by these developments. The environmental impact of housing development on the scale proposed, in particular with regard to St Andrews will destroy the landscape of St Andrews. It is considered the scale of the proposal will require reappraisal of all the social structures necessary to underpin developments.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town. It is considered this is potential for St Andrews to play a vital role in encouraging opportunities.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

If there is a demonstrable need for the housing in Draft Plan Policy H3, a sensitive approach is required. In considering the environmental effects of the increase in population, the effects on factors such as transportation required to be taken into account. For example, the public transport service can be delivered in such a way as to reduce the effect of siting of new houses.

Response:

Comments noted. Consideration of environmental and transport impacts will be addressed through the Area Local Plan, Master Plans and development briefs. Draft Plan Policy H3 now Finalised Plan Policy H2.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

There is no need to attempt over developed sensitive areas, rather Fife Council should consider developing those areas where falling populations have led to closure of amenities such as shops and schools thus leading to greater diversity which will enhance the lives of those in these locations.

Response:

The Finalised Structure Plan seeks to address these problems of areas where reversal of falling population trends is desirable. However, it must also address the future of the more popular areas to ensure that these are not development at the expense of the areas where developed requires to be promoted.

Action:

McLean, Neil - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Strongly object to the plan to build 1850 new homes by 2026 in St Andrews. Developers have all but ruined the town already and made excessive profits yet failed to provide sustainable affordable housing, suitable infrastructure and have damaged some of the historic value of the town. St Andrews simply cannot take a further 1850 houses and this development should be stopped before the town ceases to be a desirable tourist destination.

Response:

Objection and concerns noted. It is considered that St Andrews can accommodate the planned development in a manner which protects the features which make it a desirable tourist destination. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

The Local Plan fails to deliver the Green Belt. The proposed Green Belt makes a mockery of the idea of a full Green Belt encircling the town and preserving its landscape setting. It is considered that the current Green Belt boundaries allow extensive land for building in areas which would result in the ruination of the landscape setting of St Andrews.

Response:

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries.

Action:

Policy and text amended.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

Development on the scale proposed for St Andrews would irretrievably damage the landscape setting and the medieval heritage of the town.

Response:

The boundary of the St Andrews Green Belt as proposed and the area for new development in St Andrews have been drawn taking full account of all the natural and built environmental issues including the landscape setting.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

It is not clear where and who provided the statistics supporting the massive development of St Andrews which would result in an additional 1850 new homes by 2026. Without supporting statistics to justify the growth, the proposed development would only result in a number of negative outcomes such as the loss of scenic beauty of the town and pressure on over-stretched utilities. In addition, it is not clear why the proposals overturn recent Fife Council documentation such as the 1998 Strategic Study, which rejected major housing developments and the approved Structure Plan 2002 which identified a zero housing requirement until 2011.

Response:

The justification for the housing land requirement is contained in the Report of Survey. The nil requirement in the Approved Structure Plan, 2002 was informed by the 1998 Strategic Study. Significant changes have taken place in the interim, which require the provision of land for new development, including decreasing household size and the demand for affordable housing.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing and to facilitate a new link road for the town.

Any new development would be subject to policies in the Structure Plan and Area Local Plan that give full consideration to issues of landscape and infrastructure provision.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The only reason that could justify the planned expansion of St Andrews by 1850 houses at 2026 would be if the town needed an influx of workers to service it's economy. St Andrews is a holiday town with no need to import workers. The local employers are the University, visitor accommodation, hotels, guest houses, medical services, local council, golf, professional services, shops, Stagecoach, farming and RAF Leuchars. The last named has their own accommodation for the vast majority of the personnel.

Response:

The justification for the housing land requirement is contained in the Report of Survey. The nil requirement in the Approved Structure Plan, 2002 was informed by the 1998 Strategic Study. Significant changes have taken place in the interim, which require the provision of land for new development, including decreasing household size and the demand for affordable housing. The revised housing allocation is set out in the Finalised Plan Proposal H2.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

A proper quantification of how many existing families on low income require genuinely affordable housing is required.

Response:

An up-to-date and robust assessment of housing needs has been provided by the Fife Housing Needs and Affordability Study. This has informed the Finalised Structure Plan and Supplementary Guidance on affordable housing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is not clear what is exactly meant by St Andrews World Class and why it features so prominently in Fife Matters. In addition it is not clear how the proposers of St Andrews World Class are accountable to the people of St Andrews. None of the brochures delivered in St Andrews indicate who specifically is behind their world class initiative.

Response:

St Andrews World Class is a partnership led by Scottish Enterprise Fife including Fife Council and other businesses, and has a representative of St Andrews Community Council, St Andrews Preservation Trust and St Andrews Merchant Association. It figures prominently as St Andrews is identified as a key centre in Fife. There is local input via Fife Council and the other local bodies.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Developer led affordable housing does not work. It is questionable as to how many of the recent so-called affordable homes remain affordable.

Response:

The scale of the affordable housing shortage in Fife is such that Communities Scotland investment is unable to address it in entirety. In such situations the planning system can make a contribution. This approach is supported by the Scottish Executive. Many other Local Authorities throughout Britain are using this approach. Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

With 1850 new homes, St Andrews will become the fastest growing town in Fife. The historic core has a limited size and St Andrews' infrastructure cannot support growth of such scale.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Seriously concerned as to whether Fife Council's economic assumptions are correct. In addition overemphasis on St Andrews as the economic driver for Fife may seriously jeopardise the uniqueness and quality of this medieval town.

Response:

It is considered that St Andrews has a role to play in encouraging new employment opportunities. Full account has been taken of the important requirements to ensure that St Andrews is not adversely affected.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Strongly object to the flood of documents published during this very short public consultation period. No one can give proper consideration to the draft plan and associated documents when there are so many other vital documents to be decided on at the same time with so little time to review them.

Response:

Concerns noted. Each document provided information about its purpose however comments re inter-relationship of documents will be given further consideration. The documents were in the public domain from late November 2004 onwards. The public consultation period was in excess of the statutory requirement and this was further extended to take account of comments submitted well beyond the closing date. The comments form was intended to assist consultees ensure comments were made in relation to the appropriate plan.

Action:

No Change

Comment No: 12

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

Definitions for affordable housing and St Andrews world class should be included in the documentation.

Response:

Affordable housing is explained in the Glossary and St Andrews World Class is a partnership led by Scottish Enterprise Fife including Fife Council and other businesses, and has a representative of St Andrews Community Council, St Andrews Preservation Trust and St Andrews Merchant Association.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Turning St Andrews into more of a commuter town for Dundee and Edinburgh contravenes Fife Council's environmental policy to reduce carbon omissions in line with the Kyoto accord and would put the already over-stretched road and train infrastructure under even more pressure.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 14

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Concerned that there appears to be no account taken of the consequences of a further 1850 households on the already over stretched education institutions in St Andrews, in particular Madras College, and overstretched health services.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan which have been reduced in the Finalised Plan to 1,200 houses. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate. Health Services provision is a matter for the providers, however, it is intended that health care will be addressed timeously.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Any affordable housing should be affordable in perpetuity. It is considered that this is the real priority and not an ill conceived 1850 house development that achieves nothing but profit for developers.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This is being actively pursued and will be addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

No Change

Comment No: 16

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

It is considered that other options exist and Fife Council must clearly show that these options have been fully explored as part of the plan preparation process.

Response:

Fife Council is actively pursuing a range of other options, not involving land use policy. These include progressing Pressured Area Status, reduction of Council Tax discount on second homes, and use of surplus Council owned land. Such measures however cannot be covered by the Development Plan which is limited to land use planning. Reference to this range of additional measures that the Council is pursuing has been inserted into the supporting text.

Action:

Insert text to outline additional measures being taken.

Thorsen, Susanne - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Strongly object to the plan to build 1850 new homes by 2026 in St Andrews. Developers have all but ruined the town already and made excessive profits yet failed to provide sustainable affordable housing, suitable infrastructure and have damaged some of the historic value of the town. St Andrews simply cannot take a further 1850 houses and this development should be stopped before the town ceases to be a desirable tourist destination.

Response:

Objection and concerns noted. It is considered that St Andrews can accommodate the planned development in a manner which protects the features which make it a desirable tourist destination.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

The Local Plan fails to define the Green Belt. The proposed Green Belt makes a mockery of the idea of a full green belt encircling the town and preserving its landscape setting. It is considered that the current green belt boundaries allow extensive land for building in areas which would result in the ruination of the landscape setting of St Andrews.

Response:

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries.

Action:

Policy and text amended.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

Development on the scale proposed for St Andrews would irretrievably damage the landscape setting and the medieval heritage of the town.

Response:

The boundary of the St Andrews Green Belt as proposed has been drawn taking full account of all the natural and built environmental issues including the landscape setting.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

It is not clear where and who provided the statistics supporting the massive development of St Andrews which would result in an additional 1850 new homes by 2026. Without supporting statistics to justify the growth, the proposed development would only result in a number of negative outcomes such as the loss of scenic beauty of the town and pressure on over-stretched utilities. In addition, it is not clear why the proposals overturn recent Fife Council documentation such as the 1998 Strategic Study, which rejected major housing developments and the approved Structure Plan 2002 which identified a zero housing requirement until 2011.

Response:

The justification for the housing land requirement is contained in the Report of Survey. The nil requirement in the Approved Structure Plan, 2002 was informed by the 1998 Strategic Study. Significant changes have taken place in the interim, which require the provision of land for new development, including decreasing household size and the demand for affordable housing. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Any new development would be subject to policies in the Structure Plan and Area Local Plan that give full consideration to issues of landscape and infrastructure provision.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The only reason that could justify the planned expansion of St Andrews by 1850 houses by 2026 would be if the town needed an influx of workers to service it's economy. St Andrews is a holiday town with no need to import workers. The local employers are the University, visitor accommodation, hotels, guest houses, medical services, local council, golf, professional services, shops, stagecoach, farming and RAF Leuchars. The last named has their own accommodation for the vast majority of the personnel.

Response:

As stated above, (0439 04), the justification for the housing land requirement contained in the Finalised Plan Proposal H2is contained in the Report of Survey.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

A proper quantification of how many existing families on low income require genuinely affordable housing is required.

Response:

An up-to-date and robust assessment of housing needs has been provided by the Fife Housing Needs and Affordability Study. This has informed the Finalised Structure Plan and Supplementary Guidance on affordable housing.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is not clear what is exactly meant by St Andrews World Class and why it features so prominently in Fife Matters. In addition it is not clear how the proposers of St Andrews World Class are accountable to the people of St Andrews. None of the brochures delivered in St Andrews indicate who specifically is behind their world class initiative.

Response:

St Andrews World Class is a partnership led by Scottish Enterprise Fife including Fife Council and local businesses and has a representative of St Andrews Community Council, St Andrews Preservation Trust and St Andrews Merchant Association. It figures prominently as St Andrews is identified as a key centre in Fife. There is local input via Fife Council and the other local bodies.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Developer led affordable housing does not work. It is questionable as to how many of the recent so-called affordable homes remain affordable.

Response:

The scale of the affordable housing shortage in Fife is such that Communities Scotland investment is unable to address it in entirety. In such situations the planning system can make a contribution. This approach is supported by the Scottish Executive. Many other Local Authorities throughout Britain are using this approach. Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on affordable housing.

Action:

No Change

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

With 1850 new homes, St Andrews will become the fastest growing town in Fife. The historic core has a limited size and St Andrew's infrastructure cannot support growth of such scale.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Seriously concerned as to whether Fife Council's economic assumptions are correct. In addition overemphasis on St Andrews as the economic driver for Fife may seriously jeopardise the uniqueness and quality of this medieval town.

Response:

It is considered that St Andrews has a role to play in encouraging new employment opportunities. Full account has been taken of the important requirements to ensure that St Andrews is not adversely affected.

Action:

No Change

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Strongly object to the flood of documents published during this very short public consultation period. No one can give proper consideration to the draft plan and associated documents when there are so many other vital documents to be decided on at the same time with so little time to review them.

Response:

Concerns noted. Each document provided information about its purpose however comments re inter-relationship of documents will be given further consideration. The documents were in the public domain from late November 2004 onwards. The public consultation period was in excess of the statutory requirement and this was further extended to take account of comments submitted well beyond the closing date. The comments form was intended to assist consultees ensure comments were made in relation to the appropriate plan.

Action:

No Change

Comment No: 12

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

Definitions for affordable housing and St Andrews world class should be included in the documentation.

Response:

Affordable housing is explained in the Glossary and St Andrews World Class is a partnership led by Scottish Enterprise Fife including Fife Council and other businesses, and has a representative of St Andrews Community Council, St Andrews Preservation Trust and St Andrews Merchant Association.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Turning St Andrews into more of a commuter town for Dundee and Edinburgh contravenes Fife Council's environmental policy to reduce carbon omissions in line with the Kyoto accord and would put the already over stretched road and train infrastructure under even more pressure.

Response:

The proposals are not to turn St Andrews into more of a commuter town but rather to provide the range and choice of housing required for all, including affordable housing.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 14

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Concerned that there appears to be no account taken of the consequences of a further 1,850 households on the already over stretched education institutions in St Andrews, in particular Madras College, and overstretched health services.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan which have been reduced in the Finalised Plan to 1,200 houses. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate. Health Service provision is a matter for the provider, however, it is intended that healthcare will be addressed timeously.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Any affordable housing should be affordable in perpetuity. It is considered that this is the real priority and not an ill conceived 1850 house development that has nothing but provide profit for developers.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on affordable housing.

Action:

No Change

Comment No: 16

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

It is considered that other options exist and Fife Council must clearly show that these options have been fully explored as part of the plan preparation process.

Response:

Fife Council is actively pursuing a range of other options, not involving land use policy. These include progressing Pressured Area Status, reduction of Council Tax discount on second homes, and use of surplus Council owned land. Such measures however cannot be covered by the Development Plan which is limited to land use planning. Reference to this range of additional measures that the Council is pursuing has been inserted into the supporting text.

Action:

Insert text to outline additional measures being taken.

Rae, Cameron - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

It is not clear how the stated intention of growing the population of Fife as a whole in a 20 year plan and attempting to concentrate on the problems of Mid and West Fife can be addressed by the proposed increase in housing of between 30% and 40% in St Andrews. It is considered this is a clear inconsistency within the plan.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Councils such as West Lothian, East Lothian and Stirling are all projected by the GRO (General Register Office for Scotland) to have population growth over 9% in the period up to 2018.

Fife is now coming under the influence of the Edinburgh City Region. Between 2000 and 2004 the population of Fife has grown by over 6,000. This level of growth easily meets the 5% aspirational population target set for Fife over a twenty year period. Recently published 2004 based population projections show Fife growing by 9.1% over the next twenty years.

Action:

Demographics work has been updated, the details of which are contained in the Report of Survey.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Concerned that no information is provided to identify the drivers for the proposed development of 2000 housing units in St Andrews which will increase the population of the town by some 30% to 40% over 20 years. If the need for such a large number of housing units is driven by the number of affordable housing units required, this approach is fundamentally flawed.

Response:

The justification for the housing land requirement is contained in the Report of Survey. The development proposals for St Andrews are aimed at meeting locally-generated needs over the period 2006-2026 and include, but are not driven by, consideration of affordable housing.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The provision of further affordable housing in St Andrews is essential but it is evident from past expansions that developer led schemes are unsustainable. It is understood the need for affordable housing in St Andrews amounts to around 400 units however the means of achieving this is not to have 2000 developer led units built and have 20% allocated to affordable housing over twenty years, after which time due to subsequent selling on only a small number of these units will remain as affordable and this goes only a very small way to satisfying this very important requirement. Fife Council must be more innovative to ensure new affordable housing is built in such a way it is sustained has just that.

Response:

The provision of affordable housing through the planning system is a legitimate means of contributing to meeting the need for affordable housing. This is supported by the Scottish Executive's planning policy. Many sites land authorities throughout Britain are using the approach. Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing. The proposed requirement for the St Andrews housing market area will be 30%.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

St Andrews is a viable town and does not require additional housing other than affordable housing. As the town's largest employer the University expects only minimal growth in employment opportunity over the time frame of the plan. Other employment growth in the town is expected to be minimal. It is not appropriate to increase the population of the town by some 30% to 40% when the majority of growth maybe commuter based and indeed the target for the whole of Fife is only 5%.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing and to facilitate a new link road for the town. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. Draft Plan Policy H5 (Finalised Plan Policy H4) sets out the requirements for affordable housing to be provided via new development. The Scottish Executive considers that St Andrews has the potential to generate employment opportunities as expressed in the National Planning Framework 2004. The approval of focussing new housing to specified developments results in most of these settlements projected to grow in excess of the 5% overall growth target.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan. Draft Plan Policy H5 now Finalised Plan Policy H4.

Gallon, E

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Strongly object to the proposals for St Andrews and surrounding areas which appear to have been produced by a team who are determined to totally destroy this corner of Fife. Housing on the proposed scale is not only a blot on the landscape but in addition brings with it the obvious problems of over crowding on roads, in schools and in medical practices. It benefits no one but developers. It is considered that it is now time to put up a "closed" sign on St Andrews and allow the town and the surrounding area to return to being a place which visitors will enjoy and one in which you would be proud to live.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

Dearle, Fiona - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Concerned that Fife Council appears to have adopted a "one size fits all" policy towards improving the lives of the people who it must serve. There appears to be no valid reasoning behind the need to grow the population of Fife by 20,000 in the 20 year Plan period.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Councils such as West Lothian, East Lothian and Stirling are all projected by the GRO (General Register Office for Scotland) to have population growth over 9% in the period up to 2018.

Fife is now coming under the influence of the Edinburgh City Region. Between 2000 and 2004 the population of Fife has grown by over 6,000. This level of growth easily meets the 5% aspirational population target set for Fife over a twenty year period. Recently published 2004 based population projections show Fife growing by 9.1% over the next twenty years.

Action:

Demographics work has been updated, the details of which are contained in the Report of Survey.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Concerned about the absence of information on the current population of St Andrews. If the council isn't sure how many people there are in the town how can it justify the need for growth. Whilst its considered there may be benefits from increasing population in other areas of Fife beset with employment losses it is considered the same approach is not applicable to St Andrews.

Response:

The proposed scale of development is considered appropriate to meet the projected requirements for the period to 2026. The numbers have been reviewed and the Finalised Structure Plan allocates 1,200 houses which is a reduction from the Draft Plan allocation of 1,000 to 1,800 houses. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

Housing allocation reduced from 1,000 - 1,800 to 1,200 in Finalised Plan.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

St Andrews is not the typical Fife town as it is a University centre and a World Class tourism centre reliant on it's visual impact. Developing 1850 new houses will ruin a medieval town. There may be benefits in the construction of the relief road on the western edge of the town but how would this impact on the Green Belt and the landscape setting of the town. Previous examples of town expansions for example the Dunfermline Eastern Area Expansion (DEX) do not install any confidence.

Response:

Housing allocation reduced from 1,000 to 1,800 to 1,200 in Finalised Plan. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. Studies in St Andrews include that only a small percentage of traffic is bypassable. Any link road would be designed taking full account of the landscape factors to ensure that it fitted into its surroundings. Concerns about DEX noted and it is considered that land allocation in the Area Local Plan, Master Plans and development briefs should ensure that development is fully controlled.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Existing congestion should be tackled through the reinstatement of the rail link, improving the park and ride facility and improving bus services. Building more roads has been proven to increase traffic, not reduce it.

Response:

Proposal PT1 of the Finalised Structure Plan (Draft Plan Proposal PT2) gives support for further consideration of transport link options for St Andrews to the rail network, and Park & Ride/Park & Choose facilities, to be addressed through the Local Transport Strategy and he Area Transport Plan.

Action:

No Change

ID 0445

Mudie, A M - Strathkinness, St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The proposals for housing development are unbelievable and the town could not cope. In addition this would render any proposal to identify St Andrews as a world class destination would be nonsense if the proposals were allowed to proceed.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. It is considered that the new development would be planned to ensure that they do not detract from the town.

Action:

Dickson, Robert - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Houses in Multiple Occupancy

Comment:

There are too many houses in multiple occupation in St Andrews which has resulted in retired and other residents being squeezed out by the number of flats being bought by investors for this purpose. The intentions of Fife Council with regard to dealing with houses in multiple occupation are not clear.

Response:

Noted. It is acknowledged that this is an important local issue. However as the Structure Plan is a strategic document, this matter is more appropriately addressed by the Local Plan process, especially the St Andrews and East Fife Local Plan.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The Plan should include policy guidance on the provision of land for the construction of retirement flats and other retirement properties.

Response:

Noted. Finalised Plan Policy H2 (Draft Plan Policy H3) guides Local Plans to allocate sites for affordable and special needs housing to meet identified local needs.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Support the serious effort to reinstate a rail link to St Andrews as soon as possible. It is considered that St Andrews cannot function as a world class destination without such a facility.

Response:

Support noted. Proposal PT1 of the Finalised Structure Plan (Draft Plan Proposal PT2) gives support for further consideration of transport link options for St Andrews to the rail network, and Park & Ride/Park & Choose facilities, to be addressed through the Local Transport Strategy and the Area Transport Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

The issue of the location of a new NHS hospital in St Andrews requires early resolution.

Response:

The need for a new hospital was addressed in the Fife Structure Plan (Approved 2002). The site is not a strategic planning issue. The Structure Plan states that a site would be identified and progressed by the appropriate Local Plan. The site proposed in the Local Plan is the one preferred by NHS Fife.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

There is no clear information on the mix of the new properties to be built in St Andrews. In addition there is no information about the supporting facilities required to provide services for the extra citizens.

Response:

This is not a strategic planning issue. The detail of housing allocations is contained within the Area Local Plan, together with consideration of local infrastructure.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

Fife Matters does not indicate how the natural setting of St Andrews will be protected against additional developer driven housing.

Response:

Policy ENV1 supports the establishment of a Green Belt round St Andrews which is identified in detail in the Draft St Andrews and East Fife Local Plan. The boundary of the proposed new development has been drawn taking full account of all the natural and built environmental issues including the landscape setting.

Action:

Quinault, Francis C - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Fife Matters appears not to reflect what the population of St Andrews considers the town requires. It is most likely they would request affordable housing rather than executive homes and improvement to services including land for small businesses and additional school provision.

Response:

Comments noted. The Finalised Structure Plan makes provisions for securing affordable housing and, in conjunction with the Area Local Plan, land for employment purposes. Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Wish to support the comments about the Fife Matters submitted on behalf of the Central St Andrews Residents Alliance (submission number 0416).

Response:

Support for Residents Alliance noted.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Concerned that at the public meeting held at St Andrews that planning officers were unable to provide information about current and proposed population levels and were unable to justify the reason for massive expansion of St Andrews.

Response:

Most of the questions posed were answered however, in many instances, the answers given were not those the questioner wished to hear. Population issues are being examined. Details which resolve this issue are contained in the Finalised Report of Survey.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Plan does not clearly justify the provision of up to 1800 new houses in St Andrews when the Structure plan foresaw population growth less than 20,000 for Fife as a whole and Mid Fife as an area was in most need of expansion. Even allowing further substantial increase in demand for housing due to the reduction in household size, the additional requirement remains unclear.

Response:

The justification for the housing land requirement is contained in the Report of Survey. Land is required for new development to meet locally-generated needs over the period 2006-2026. The focus of the Plan's strategy is to regenerate Mid Fife, with provision for growth in West and East Fife to meet local needs and support the economy.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Ramsay, Monica - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

It is not clear why the original Scottish Office Green Belt Plan has not been adhered to.

Response:

Assume comment refers to policy in Approved Fife Structure Plan 2002. Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries.

Action

Policy and text amended.

McMullan, E - Boarhills, St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Object to the planned 4000 houses in East Fife and the 2000 houses in St Andrews.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Lee, Terence R - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Share the extreme scepticism that was evident at the consultation meeting in St Andrews. The turnout was unprecedented and the opposition spoke volumes about the feelings of people of St Andrews and their near neighbours not only about the proposals themselves but about the explanations given by the officers in response to comments from the floor. The confusion over the population of St Andrews and the doubts whether the estimate provided included students or not was astounding.

Response:

Most of the questions posed were answered however, in many instances, the answers given were not those the questioner wished to hear. The population for St Andrews does include students.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The lack of attention given to the projected needs and policies of the University of St Andrews, which is the principal economic back bone of St Andrews, is deplorable. There is no rational justification for the housing projections in the Plan and for the ways in which the University is failing to protect St Andrews against proliferation of houses in multiple occupation. Indeed the University is feeding the problem by selling a number of properties it owns within the town. In addition there is no discussion of the gridlock that occurs in the town centre partly due to the failure of the University to control student cars or to provide enough car parking space for staff who commute into the town.

Response:

The University has not been ignored by the Development Plan Process. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. Fife Council has no control over the University with regard to the issue of houses in multiple occupation and its scale of property. The issue of car parking is addressed via the Local Transport Strategy and Area Transport Plan.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Concerned that Fife Council is the only stakeholder who cannot understand that almost everyone in St Andrews wants and expects a green belt along the general lines of that proposed by David Tyldesley that is to say Green Belt that encircles the town including the golf courses and the coastal areas which is sufficient in breadth. In addition it is considered that within the area so designated there would be a presumption against any development. Specification of the Green Belt in the local plan is vague and limited - need to be assured that its designation will be backed by the full legislation on Green Belts provided by the Scottish Executive.

Response:

The detailed boundary of the Green Belt is shown in the draft St Andrews and East Fife Local Plan. It has been delineated to provide for development need and this boundary will be defendable in the long term. The boundary of the Green Belt delineated in the draft Local Plan takes account of the landscape setting of the town.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Anticipated the delineation of the St Andrews Green Belt immediately after the approval of the Fife Structure Plan 2002 however this did not take place. Concerned that after waiting three years the Green Belt will be delineated in accord with Fife Matters and not within the policy framework of the 2002 plan.

Response:

Concerns noted. Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries.

Action:

Policy and text amended.

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The housing land requirement for St Andrews has grown from zero in the 2002 Structure Plan to at least 1000 houses. This is the highest percentage increase in housing provision in any settlement in Fife. There is no disputing the need for more houses in Fife but St Andrews is an inappropriate location for this development. Central Fife needs to develop but St Andrews does not. There is concern that the proposals to develop a large number of houses in St Andrews is developer-driven.

Response:

Concerns noted. The justification for the housing land requirement is contained in the Report of Survey. The nil requirement in the Approved Structure Plan, 2002 was informed by the 1998 Strategic Study. Significant changes have taken place in the interim, which require the provision of land for new development, including decreasing household size and the demand for affordable housing. The Development Strategy identifies St Andrews for development as a world class destination and an economic driver for Fife in terms of academic development and tourism.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The local planning authority may have some obligation to provide reasonable and controlled development that does not damage the quality of life for residents, however it has no obligations to meet the demands of developers. In relation to St Andrews the obligation is much stronger to the millions of people throughout the world for whom St Andrews is an iconic heritage site and place of beauty.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The argument that people brought up in St Andrews have a right to live there is hard to sustain. St Andrews is very far form unique in this, in fact, it applies to most places where values have been raised because people want to live there. There is affordable accommodation within a twenty mile radius and if this is not acceptable, the problem is unlikely to be resolved by trying to resist market forces and the law as it stands at present.

Response:

These are not land use issues. However, Fife Council's Housing Service has published an Implementation Guide on Affordable housing, which sets out priority client groups. Households with a local connection are given priority but not exclusively so. The policy objective is to meet locally arising needs as locally as possible, and within the same housing market area wherever possible.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Suggests that when developers agree to a ratio of affordable houses, they would simply cover any shortfall in profits by raising the price of the houses they were allowed to build in that particular market area.

Response:

Disagree. The costs of providing affordable housing should be factored into the site acquisition costs and should not affect sale prices of housing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

It is understood that present legislation does not allow for selective allocation of affordable houses to locals natives or to young professional people whose work is essential to the local community such as nurses and dentists. Until the legislative obstacles to affordable housing can be removed, it is no panacea.

Response:

This is not a land use planning issue. However the issue of priority client groups is addressed in the Implementation Guide on Affordable Housing. The planning system can make a contribution to meeting the needs for affordable housing but cannot meet it in entirety.

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Fife Council should be aware that one of the main concerns expressed in the research literature is that development provided within a Green Belt is generally leap-frogged to just outside the outer boundary. The inexplicable narrowness of the proposed Green Belt around St Andrews is an open invitation to leap-froggers.

Response:

The detailed boundary of the Green Belt is shown on the draft St Andrews and East Fife Local Plan. It has been delineated to provide for development need and this boundary will be defendable in the long term. The Scottish Executive has recently issued a Scottish Planning Policy (SPP) note on Green Belts which updates Circular 24/1985. This is being taken into account in finalising both the Structure Plan and the St Andrews and East Fife Local Plan.

Action:

No Change

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Concerned about the omission of the golf courses from the St Andrews Green Belt and the potential this offers for encouraging development.

Response:

The boundary of the St Andrews Green Belt delineated in the draft St Andrews and East Fife Local Plan takes account of the landscape setting of the town.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Concerned about the specification of the Green Belt returning to the rejected concept of inter visibility. This raises concern that developers will be able to plead that their application within the Green Belt will be acceptable because site cannot be seen from the historic core and vice versa. This is a seriously constrained view of a Green Belt and it is considered that most people in St Andrews are in favour of development being concentrated around existing settlements and for the intervening spaces to be unspoilt countryside. This particular sensitivity about the coastal Areas of Great Landscape Value but part of these appear also to be excluded from the Green Belt.

Response:

The detailed Green Belt policy guidance contained in the Draft Area Local Plan complies with Government guidance. The Green Belt boundary has been delineated to ensure adequate land is available for development to meet the needs of the period to 2026. The Finalised Structure Plan Policy ENV1 gives the St Andrews Green Belt a more positive role in the future development of St Andrews guiding development to appropriate locations in environmental terms. Local landscape designations including AGLV are currently under review.

Action:

No Change

Comment No: 13

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The existing legislation, under which so-called affordable houses can be sold off at a profit after a few years, would have to be changed before any scheme can succeed.

Response:

Change of legislation is matter for central Government. It is acknowledged that retention of affordable housing is a very important issue. Under current legislation, this is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This was and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

Laidler, E.W. - Strathkinness, St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Concerned that the revised strategy for St Andrew has lost sight of the previous guidance contained in the approved 2002 Fife Structure Plan which was based on the St Andrews Strategic Study. This concluded that St Andrews is at its landscape capacity and that the landscape setting is crucial to its character. In addition the Structure Plan contained policies for the designation of a Green Belt to protect the historic town. However the scale of development now proposed would make it impossible to retain the existing character of St Andrews.

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements. Policy ENV1 of the Finalised Structure Plan gives the St Andrews Green Belt a more positive role in the future development of St Andrews guiding development to appropriate locations in environmental terms. The landscape issues have been fully considered as part of the process of delineating the St Andrews Green Belt boundary.

Action:

Hart, RM - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Concerned that the number of houses scheduled for St Andrews in the Draft Plan is out of proportion to the likely demand. It is unclear where the people who live in these houses would come from and it is anticipated that houses would accommodate commuters, second homes and houses in multiple occupation.

Response:

The justification for new development in St Andrews & East Fife is contained in the Report of Survey. The housing land requirement is aimed at meeting locally-generated needs over the Plan period 2006-2026. The St Andrews & East Fife Local Plan addressed the detail of development proposed and the issue of Houses in Multiple Occupation.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

It is not clear why there is such a difference in the proposed new housing needs in 2005 when the 2002 Fife Structure Plan stated there was no need for new housing in St Andrews till 2011.

Response:

The justification for the housing land requirement is contained in the Report of Survey. The nil requirement in the Approved Structure Plan, 2002 was informed by the 1998 Strategic Study. Significant changes have taken place in the interim, which require the provision of land for new development, including decreasing household size and the demand for affordable housing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is unlikely that local the economy of St Andrews can produce sufficient jobs to provide livings for an extra 1850 homes by 2006.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Housing in the St Andrews area is currently too expensive and any houses which were originally affordable have been sold on and are no longer affordable. It is notable that junior university staff are unable to buy houses in St Andrews at present nor are the children of local residents who grew up in the town and wish to remain there.

Response:

Fife Council is well aware of the shortage of affordable housing in the St Andrews housing market area. The results of the updated Housing Needs and Affordability Study have confirmed and quantified this. It is considered that the approach to affordable housing being taken forward through the Finalised Structure Plan and Supplementary Guidance on Affordable Housing addresses the issue by making an important contribution to meeting this shortfall.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

It is questionable if the "affordable housing" to be provided in St Andrews will be affordable as the definition of affordable housing appears to vary across Fife depending on housing costs.

Response:

This comment presumably relates to low cost housing for sale, which is only one means of delivery of affordable housing. Where this tenure is being considered, affordability will be determined by house prices and average household incomes which vary across Fife. The updated Housing Needs and Affordability Study is being used to determine affordable housing price targets. These are set out in the Implementation Guide.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

It appears that the proposed house building in St Andrews is developer-led and is not supported by local residents. The infrastructure and local services, but in particular the provision of education, will be under significant strain if the proposed number of houses is built.

Response:

The number of houses proposed for St Andrews is aimed at meeting locally-generated needs and is development rather than developer led. Finalised Plan Policies DC1 and H3 (Draft Plan H4) provide support for the full consideration of infrastructure requirements prior to development commencing. The delineation of development areas in the draft Area Local Plan has taken account of infrastructure issues.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

It is unclear why the issue of the capacity of Madras College has not been addressed by the Structure Plan document.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is questionable how St Andrews can be described as world class when the plan proposes to destroy precisely those characteristics which make it a marketable commodity. Building on the proposed scale will inevitably impact on the local landscape setting and will not be in accordance with the green belt proposals.

Response:

The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. The boundary of the St Andrews Green Belt is delineated for the first time in the draft Local Plan. The Green Belt is designated to provide for necessary development and service other policy objections. The Finalised Structure Plan Policy ENV1 gives the St Andrews Green Belt a more positive role in the future development of St Andrews guiding development to appropriate locations in environmental terms. Local landscape designation including AGLV are currently under review.

Action:

St Andrews Links Trust, Mason, Peter - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Concerned that large increases in the population will have knock on effects on the availability of playing time for visitors and resultant significant fall in income. Further it is considered that a reduction in visitor playing time could also have a significant knock on effect on the local economy which depends on the golfing visitor flow into St Andrews to play on the links. It is considered the links provide the fulcrum and which much of the golf tourism industry in Scotland revolves. If there was to be an adverse impact on visitor capacity at St Andrews, this would have an effect across Scotland as a whole.

Response:

Concerns noted. However, a number of visitors are aware of the restrictions on playing in St Andrews and are catered for at a number of other courses in Fife and surrounding areas.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

There is no clear reason why the existing and proposed golf course developments have been excluded from the boundaries of the St Andrews Green Belt.

Response:

These landscape issues have been fully considered as part of the process of delineating the St Andrews Green Belt boundary included in Area Local Plan.

Action:

Hope Park Residents Association, Quinault, Frank - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Supports the views expressed in the submission made by the Central St Andrews Residents Alliance. (See submission 0416).

Response:

Support for Alliance views noted.

Action:

Seth, DR - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

The proposed population increase across Fife is completely unrealistic.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Councils such as West Lothian, East Lothian and Stirling are all projected by the GRO (General Register Office for Scotland) to have population growth over 9% in the period up to 2018.

Fife is now coming under the influence of the Edinburgh City Region. Between 2000 and 2004 the population of Fife has grown by over 6,000. This level of growth easily meets the 5% aspirational population target set for Fife over a twenty year period. Recently published 2004 based population projections show Fife growing by 9.1% over the next twenty years.

Action:

Demographics work has been updated, the details of which are contained in the Report of Survey.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The number of houses proposed to be built in Fife on the basis of the unrealistic population growth figures is unrealistic. Concerned that the requirement is driven either by developers or a lack of understanding of population trends.

Response:

Further work has been undertaken to consider demographic change in Fife over the Structure Plan period. This is contained within the Report of Survey and reinforces the justification for the policy assumptions on population growth. While the Structure Plan strategy is to grow the population of Fife by 5% over the period 2006-2026, the housing land requirement is an assessment of housing need and demand principally generated by new households. This is driven by a reduction in household size brought about by natural change in Fife, together with inward migration.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The implementation of development of tourism and golf related facilities, especially in the St Andrews area, is likely to be hampered by the poor road and rail communications between St Andrews and other parts of the East Neuk.

Response:

The Structure Plan supports improvement to infrastructure including public transport facilities and roads. These will be progressed via the Local Transport Strategy and Area Transport Plan.

Action:

Halliday, Elspet - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Concern that there is no mention of affordable houses for rent within Fife Matters.

Response:

Agreed. Changes have been made to both the Finalised Structure Plan and the Supplementary Guidance to emphasise that Fife Council's clear priority will be for housing for rent.

Action:

Change supporting text to Policy H4 (was Policy H5) to include reference to social rented housing.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Concern that no mention is made of a new secondary school for the Newport/Tayport area which is considered should be a priority.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

There is a requirement for permanent sites for trades people in St Andrews. There is concern that every piece of land is being used for housing or flats with knock on effects on job retention/creation.

Response:

The Structure Plan seeks the provision of additional employment land in the St Andrews area as set out in Proposal PE1. However, site specific issues are more appropriate to the St Andrews and East Fife Local Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

The centre of the town is often gridlocked - partly due to the badly judged position of pedestrian crossings.

Response:

This is an issue to be addressed via the Local Transport Strategy and Area Transport Plan.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Visitors coming to a historic town centre such as St Andrews expect an interesting place to visit. St Andrews has changed markedly in recent years with the loss of a number of specialist and other privately owned shops.

Response:

Noted. Town centres are dynamic locations and the planning system cannot preserve a location at any point in time. This trend is characteristic of many town centres. Fife Council is committed to enhancing the character of all town centres in Fife, including St Andrews.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The Strategic Study of 1998 was correct to state that: a) St Andrews is at its landscape capacity and no further expansion should take place and; b) the quality of the town's environment is under threat from traffic congestion. It is not clear what has changed since 1998 which has prompted Fife Council to produce a new plan.

Response:

It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Mackenzie, J S - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The Structure Plan for St Andrews area has not been sufficiently thought out and will not improve the area. St Andrews at present simply cannot cope with the influx of existing traffic and the plan fails to propose a suitable ring road.

Response:

Road survey information indicates that a relatively small percentage of St Andrews traffic is bypassable. The future roads provision in the area is an issue to be addressed via Local Transport Strategy and Area Transport Plan.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

It is not clear what kind of houses Fife Council envisages in East Fife, who will buy them and where will these buyers come from.

Response:

The Area Local Plan identifies sites for development which provide for a range of sites and tenures in order to promote mixed and balanced communities. The number of houses proposed is determined by the housing land requirement, the justification for which is contained in the Report of Survey.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

There is a desperate need for a new secondary school in the area. If the younger generation is to be well educated and able to stand up to modern living and compete with other schools in other towns then there is a requirement for good new schools and surroundings. Higher education standards is an aim of this current government.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

In view of the University expansion and the dependence on tourism it is considered that a new rail link should be fully considered in order to assist in addressing road congestion problems.

Response:

The University and tourism could be expanded without the provision of a new rail link. Proposal PT1 of the Finalised Structure Plan (Draft Plan Proposal PT2) includes reference to further consideration of transport link options for St Andrews to the rail network, to be addressed through the review of the Local Transport Strategy.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The proposal for extensive house building in St Andrews infringes on the Green Belt of the previous Structure Plan. It is considered that small towns and villages as well as communities can be so easily destroyed and the human factor must be fully considered.

Response:

The boundary of the St Andrews Green Belt is delineated for the first time in the draft Local Plan. The Green Belt is designated to provide for necessary development and meet other policy objectives.

Action:

Cowan, Dorothy - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

There are a number of factors which detract from the pleasure of living in St Andrews including traffic congestion and accessibility to the town centre and associated parking problems. It is considered that much of the problem is generated by students who live within the town centre in houses in multiple occupation and all own cars. It is considered that these are the issues that should be addressed by Fife Matters before it is too late and St Andrews ceases to be a lovely place to live.

Response:

Road survey information indicates that a relatively small percentage of St Andrews traffic is bypassable. The future roads provision in the area is an issue to be addressed via Local Transport Strategy and Area Transport Plan.

Action:

Humphries, Alan & Catherine - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Object to the total inadequacy of the proposed Green Belt which does not give any level of protection to the Southern Hillside, the natural coast line nor the golf courses. It is considered essential for St Andrews to retain its green bowl setting and its unique character. Until a suitable Green Belt is established there should be no further moves towards increased house building or any other type of expansion.

Response:

The landscape issues have been fully considered as part of the process of delineating the St Andrews Green Belt boundary. The detailed boundary of the Green Belt is shown in the draft St Andrews and East Fife Local Plan. It has been delineated to provide for development need and this boundary will be defensible in the long term.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is not clear why the findings of the 1998 Strategic Study have been ignored as it is considered that nothing has changed since that date. Fife Council is putting the requirements of commercial speculators and developers before the wishes of the residents of the town and this is totally unacceptable.

Response:

It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned. The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements. Disagree that the plans for St Andrews are developer driven.

Action:

Wigmore, Peter & Sheila - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

The centre of St Andrews is gridlocked with traffic at present and public utilities are stretched therefore cannot see how St Andrews can take any more housing.

Response:

The issue of increases in traffic is partly addressed via planning policies and partly via the Local Transport Strategy and Area Transport Plan. Finalised Structure Plan Policy DC1 seeks to ensure that appropriate infrastructure and transport projects are delivered in conjunction with all new development. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The 1998 Strategic Study rejected major housing development in St Andrews and the approved Structure Plan proposed zero new housing until 2011. It is therefore unclear why there is now a need for new housing. In addition, 1850 new houses will negatively impact on local services and the historic core of the town.

Response:

The justification for the housing land requirement is contained in the Report of Survey. The nil requirement in the Approved Structure Plan, 2002 was informed by the 1998 Strategic Study. Significant changes have taken place in the interim, which require the provision of land for new development, including decreasing household size and the demand for affordable housing. Any new development would be subject to policies in the Structure Plan and Area Local Plan that give full consideration to issues of landscape and infrastructure provision.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

It is not clear what is meant by affordable housing.

Response:

The definition of affordable housing used in the Finalised Structure Plan and Supplementary Guidance is consistent with that contained in SPP3 and PAN74. It is a broad definition which covers a range of tenures. With regard to low cost housing for sale, affordability varies according to income and house prices. The Implementation Guide on affordable housing produced by Fife Council's housing service sets out target house prices.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Affordable housing must be affordable in perpetuity. Previous attempts to provide affordable housing in St Andrews have failed as originally affordable housing has been sold on at market value.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

The development on the scale suggested would irretrievably damage the landscape setting and medieval heritage of the town.

Response:

The boundary of the St Andrews Green Belt as proposed has been drawn taking full account of all the natural and built environmental issues including the landscape setting.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

There is no industry in St Andrews to provide jobs for additional people. As a result the new housing will merely expand St Andrews as a commuter town for Dundee and Edinburgh and this is in contravention of Fife Council's environmental policy to reduce carbon emissions in line with the Kyoto accord.

Response:

The Structure Plan seeks the allocation of additional employment land in the St Andrews area. It is also expected that activity in other sectors will increase the employment opportunities thereby the housing will be mostly taken up by those employed locally.

Action:

Anderson, Cecile - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Surprised to learn of the changes to the Green Belt policy. This matter was fully debated several years ago and it is understood that there would be a Green Belt introduced to stop St Andrews from spreading into the countryside. Apparently it is planned to build 1800 houses to the south and west of the town.

Response:

The Finalised Structure Plan Policy ENV1 gives the St Andrews Green Belt a more positive role in the future development of St Andrews guiding development to appropriate locations in environmental terms. The Green Belt as delineated in the Area Local Plan provides a long term defensible boundary.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

South Street in St Andrews is frequently gridlocked. There are no plans for increasing the amount of parking within St Andrews.

Response:

These are detailed issues to be addressed via the Local Transport Strategy and Area Transport Plan.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Madras College is one of the largest secondary schools in Fife and it is on a split site. Fife Matters makes very little mention of any expansion to accommodate all the extra pupils anticipated to do a new development.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The whole nature of the town will be changed and historic aspects of the town will be completely swamped by the new development. People in St Andrews are very proud of the town's traditional character it is considered that further development should be scrapped before damaging this lovely town further.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

Campbell, Morag - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

St Andrews cannot always have more housing due to the lack of capacity and facilities and services currently available and the existing traffic situation which sees gridlock almost every day.

Response:

The issue of increases in traffic is partly addressed via planning policies and partly via the Local Transport Strategy and Area Transport Plan. Finalised Structure Plan Policy DC1 seeks to ensure that appropriate infrastructure and transport projects are delivered in conjunction with all new development. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

The green bowl setting of St Andrews will be destroyed by proposals to develop housing within the area.

Response:

The boundary of the St Andrews Green Belt as proposed for in St Andrews has been drawn taking full account of all the natural and built environmental issues including the landscape setting. This should retain the green bowl feature.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Providing a rail link would be advantageous. However to wait until 2026 to provide this facility would be too late.

Response:

The current level of commitment to the rail link is set out in Finalised Plan Proposal PT1 (Draft Plan Proposal PT2).

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

Over the last 20 years St Andrews has drastically changed and not for the convenience or enjoyment of its citizens.

Response:

Noted.

Action:

Murray, M - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

St Andrews cannot take any more houses as this would add to the existing traffic congestion problems in the town centre. Problems have been exacerbated by pedestrian crossings, which although welcome, do not facilitate traffic movement.

Response:

The issue of increases in traffic is partly addressed via planning policies and partly via the Local Transport Strategy and Area Transport Plan. Finalised Structure Plan Policy DC1 seeks to ensure that appropriate infrastructure and transport projects are delivered in conjunction with all new development. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

It is sheer greed selling every piece of land for housing because more money can be made from that.

Response:

This is not a strategic planning issue.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Affordable houses are required for St Andrews.

Response:

Acknowledgement of need noted. However, the matter is more properly addressed by the St Andrews and East Fife Local Plan. Comment will be considered in that context.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

It is a disgrace that business people are being put out of Bassaguard in order to release the land for housing development.

Response:

This issue is not strategic and being site specific is more appropriately addressed in the St Andrews and East Fife Local Plan.

Action:

Wowk, Karen - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Object to the planned development of so many houses in St Andrews. It simply cannot cope with such a growth in numbers. Even now the traffic is at gridlock every weekend and throughout the Summer.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing and to facilitate a new link road for the town.

The issue of increases in traffic is partly addressed via planning policies and partly via the Local Transport Strategy and Area Transport Plan. Finalised Structure Plan Policy DC1 seeks to ensure that appropriate infrastructure and transport projects are delivered in conjunction with all new development. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new relief road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Hunter, Joan - London

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Concern that although defined as medium scale growth the proposal for St Andrews masks what in effect will be high growth for a small town. It is considered that 1800 houses over the next twenty years may be medium scale in a Fife wide context but for St Andrews this is a very high rate of growth.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

It is not clearly explained why St Andrews needs so much new housing and how the requirement figures have been derived in the light of the previous approved Structure Plan.

Response:

The justification for the housing land requirement is contained in the Report of Survey. The nil requirement in the Approved Structure Plan, 2002 was informed by the 1998 Strategic Study. Significant changes have taken place in the interim, which require the provision of land for new development, including decreasing household size and the demand for affordable housing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is not clear why development is being proposed in St Andrew in view of the comments contained in the 1998 Strategic Study which said that St Andrews is at its landscape capacity. Does this suggest the landscape has changed over the last seven years to accommodate so much extra housing?

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

With regard to Draft Plan Policy H5 it is unclear whether a condition for affordable housing to remain so can be adhered to in practice. This means that 55% of new housing (in the St Andrews area) will be executive. Further the policy will be a charter for yet more speculative housing in the town or on its scenic periphery.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and will be addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing. In the light of PAN 74, the updated Housing Needs and Affordability Study and the public consultation, the percentage requirement has been revised to 30%. The remaining mainstream housing should involve a range of house types to ensure mixed and balanced development. Future housing development should be consistent with the policy framework set out in the Development Plan.

Action:

Change percentage requirement in Finalised Plan Policy H4 (was H5).

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

It is not clear how affordable housing can be secured without it being built on the back of even more executive housing.

Response:

The planning system can make a legitimate contribution to the provision of affordable housing and this is set out in SPP3 and PAN 74. However it is one means of provision and cannot address the need in entirety. Other tenures can include social renting, shared equity and shared ownership. In addition Fife Council is pursuing a number of other initiatives such as reduced Council Tax discount on second homes, Pressured Area Status and use of surplus Council owned land. Communities Scotland funding will also allow some social rented housing to be built

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Green Belt policy is a weak statement. It should reflect Scottish Office Circular on Green Belt.

Response:

Disagree. Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which also identify the boundaries.

Action:

Christie, A - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Traffic congestion is a major problem in St Andrews and this will be exacerbated by the Open Golf Championship.

Response:

Comments noted. This is not a Structure Plan issue. Traffic issues are addressed through the Local Transport Strategy and Area Transport Plan.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

There is no need to develop a new hospital on the southern hills of St Andrews when there is a perfectly good site at St Leonards Field which could be developed.

Response:

The need for a new hospital was addressed in the Fife Structure Plan (Approved 2002). The site is not a strategic planning issue. The Structure Plan states that a site would be identified and progressed by the appropriate Local Plan. The site proposed in the Local Plan is the one preferred by NHS Fife.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

It is accepted that there is a need for more houses in St Andrews but these should be affordable. It is considered that these houses should be available for rent (housing associations) rather than properties for purchase which young people cannot afford to buy.

Response:

The number of affordable houses sought, as outlined in the Finalised Structure Plan is based on results of the updated Housing Needs and Affordability Study, the Public Consultation and the Scottish Executive Guidance (PAN 74). Whilst the Council's priority is for social rented housing, delivery through housing associations using Communities Scotland funding, will be insufficient to meet Fife's needs. Therefore other tenures will be required.

Action:

Emphasise Council's priority for social rented housing by inserting wording in supporting text to Finalised Plan Policy H4 (Draft Plan Policy H5).

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

If all the proposed houses are built where will the children be educated? The schools are currently overcrowded.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

The rail link is a very good proposal. It would greatly reduce the amount of people driving into the town thus reducing the problems of parking etc.

Response:

Support noted. Proposal PT1 of the Finalised Structure Plan (Draft Plan Proposal PT2) supports further consideration of transport link options for St Andrews to the rail network, to be addressed through the Local Transport Strategy.

Action:

McAdam-Smith, Alison - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Consider there has been little real consultation with the population of St Andrews on what they want or need. Considers it unlikely that St Andrews would ask for executive homes rather than affordable housing; ill-considered plans for transport and services including small businesses and a school.

Response:

Concerns about consultation and content of plans noted.

Action:

Adamson, Peter - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Object to all aspects of the Structure Plan. It is considered that the town of St Andrews is currently overcrowded with houses and any additional housing development will exacerbate the dreadful traffic problem, will impact on the unique setting and character of the town which has been gradually vandalised by Fife Council, which has shown no regard for public opinion, over recent years.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Any additional housing in St Andrews must be affordable housing and this should be provided through housing co-operatives. Fife Council uses the term affordable housing as a means for blanket building of houses which quickly reach present commercial levels.

Response:

Organisational issues are outwith the remit of the Structure Plan. Additional housing should involve a range of tenures and types in the interests of mixed and balanced communities.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Schools in the St Andrews area are already over subscribed.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

Cowan, J B - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

The traffic around the town centre is at gridlock several times in the day. In addition parking is most inadequate and the park and ride scheme grinds to a halt as all available spaces are filled by 11am each day.

Response:

These are detailed issues to be addressed via the Local Transport Strategy and Area Transport Plan.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

The aspect to the south of the town is already compromised by shoddy expensive new building.

Response:

The development mentioned is considered to be acceptable. The Finalised Structure Plan does place emphasis on the quality of built development design. The Council has also published an Urban Design Guide to promote good design.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Madras High School is seriously overcrowded and has been for a number of years.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

Public services appear to be in constant crisis in particular reference to sewage escaping into the environment, vandalism and litter to name but a few.

Response:

The actual physical provision and managing of sewerage is not a Local Authority issue - this is the responsibility of Scottish Water. Local Authorities can, in most instances, only react to the actions of those who vandalise property and litter. Good design of new development can have a positive role in reducing the opportunity for vandalism.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

It is not clear how many houses can easily be built in St Andrews when the services required to service them are grossly inadequate.

Response:

It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Hate to think of what such a wonderful place as St Andrews will be like in another 14 years with the same neglect and disregard of what the people of St Andrews want as opposed to a centralised organisation apparently out to destroy it.

Response:

Concern noted.

Action:

Tynte-Irvine, Anne - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Developing St Andrews as a world class destination is nonsense because St Andrews is already much more than that. It is the jewel in the Fife crown and must be treated in a completely different way to any other town in Fife. If the huge development to the west of the town is permitted this will result in the destruction of very special status of the town which is currently struggling to cope with traffic.

Response:

The numbers have been reviewed and are included in the Finalised Structure Plan. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. The details of the development will be planned via the Area Local Plan, Master Plans and development briefs to ensure that it complements the town.

Action:

The housing allocations across Fife are identified in Finalised Plan Proposal H2. Housing allocation in St Andrews reduced to 1,200 houses.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

St Andrews needs a proper Green Belt as proposed by the Green Belt Forum and the St Andrews Preservation Trust. Current proposals raise great dangers of destroying the very special green setting of the town which can never be replaced.

Response:

The boundary of the Green Belt delineated in the draft Local Plan takes account of the landscape setting of the town.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

It is unclear how Fife Council justifies the additional housing land allocation for St Andrews for period 2006 - 2026. It is suspected that this is purely a developer-led policy.

Response:

The justification for the housing land requirement is contained in the Report of Survey. The nil requirement in the Approved Structure Plan, 2002 was informed by the 1998 Strategic Study. Significant changes have taken place in the interim, which require the provision of land for new development, including decreasing household size and the demand for affordable housing. The strategy is development-led, to release sites for new housing in a planned way.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The St Andrews Strategic Study 1998 indicated that St Andrews was at its natural landscape capacity. It is not clear what has changed since that date to make it possible to accommodate so much extra housing.

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

From the plan it appears that the housing designated is to be executive housing and little is said about the very necessary affordable housing.

Response:

Disagree. The Structure Plan identifies affordable housing as being one of the key challenges facing Fife in the period up to 2026, and Finalised Plan Policy H4 (Draft Plan Policy H5) addresses this. The Plan does not promote purely executive housing but rather promotes mixed and balanced communities through a diverse range of housing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The provision of new housing will result in the town becoming a dormitory town for Dundee and little consideration is being given to St Andrews residents who cannot afford high prices.

Response:

Disagree. In addition to the housing land provisions, the Finalised Structure Plan indicates that employment land will also be provided. The Finalised Plan also addresses the issue of the provision of affordable housing for St Andrews setting a target of 30% of new housing being affordable.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Fife Council should be paying attention to the comments made by residents of St Andrews who are concerned about the damage they consider is being done to the town.

Response:

All comments have been given full consideration prior to finalising the Structure and Local Plans.

Action:

Anonymous,

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

There should be a limit on how many houses should be built in St Andrews and none of these should be private houses.

Response:

The Finalised Plan Proposal H2 specifies the strategic requirement and this will be addressed partially by planning and partially via Area Local Plan, Master Plans and development briefs.

Action:

Housing allocation in St Andrews reduced to 1,200 houses.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Have the following to questions:

A) Is it not possible to say no to developers?

B) Is St Andrews so much in need of money that the town needs to be destroyed?

It does not need to become a developer's paradise.

Response:

It is possible to say 'no' to developers. The Structure Plan sets out the overall requirement for new housing land and the general location. The Local Plan identifies the specific sites to meet this requirement. Concern noted.

Action:

Housing allocation in St Andrews reduced to 1,200 houses.

Rowlands, R - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Object to the flood of documents with incomplete information which is difficult to understand.

Response:

Objection noted. It is considered that the suite of documents provided a great deal of relevant information. The consultation process is under review to improve consultation in the future.

Action:

Review consultation process.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

St Andrews cannot cope with an additional 1850 new houses. Just leave St Andrews as it is, a wonderful place to live. It is unique and special, please don't destroy the gem in Fife.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. Planned development will ensure that new development fully respects the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Rushworth, A J - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

St Andrews is a unique historic conservation area requiring protection from further expansion. The centre of the town is already overcrowded and cannot sustain the present size of population.

Response:

The conservation area is located in the centre of the town. An aim of the Green Belt is to protect views of the centre. The Finalised Local Plan will extend the coverage coast to coast.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

There should be a rigorous St Andrews Green Belt imposed on the present boundary and all new housing outwith this present boundary halted.

Response:

The Green Belt boundary depicted on the Area Local Plan is that preferred as it provides for both development and conservation objectives.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Housing needs for Fife should be provided at inland settlements.

Response:

Noted. The Structure Plan identifies the broad amount and location of new housing land, with Area Local Plans addressing specific site allocations and local needs. Finalised Plan Policy H2 (Draft Plan Policy H3) directs Local Plans to identify a range of sites, tenures and house types in each Local Plan Area.

Action:

Slim, Ann - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

The town centre is at gridlock.

Response:

These are detailed issues to be addressed via the Local Transport Strategy and Area Transport Plan.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

The green bowl surrounding St Andrews has almost disappeared.

Response:

The boundary of the St Andrews Green Belt as proposed has been drawn taking full account of all the natural and built environmental issues including the landscape setting. This should retain the green bowl feature.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Madras College is almost at bursting point.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Built Environment

Comment:

New development has taken place in St Andrews which has resulted in changes to the skyline. In addition in some locations buildings have been extended to the very edge of the pavement and this will prevent any road widening in the future.

Response:

All these matters would be fully considered prior to the grant of any planning permission.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Recent road works in St Andrews resulted in gridlock. It is suggested that when St Andrews becomes permanently gridlocked people will simply write off the town as not worth the effort to visit.

Response:

Although important, this issue is more appropriately addressed via the Local Transport Strategy and Area Transport Plan.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

What is needed is the preservation of the character and charm of St Andrews which is already severely eroded.

Response:

Concerns noted. New development in St Andrews would be planned to ensure that it's character and charm is enhanced and is not eroded.

Action:

Hunter, John - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

The policy on Green Belt does not reflect green belt policies brought forward in the Scottish greenbelt circular. The green bowl setting of St Andrews will be destroyed.

Response:

The detailed Green Belt policy guidance is contained in the Draft Area Local Plan which complies with Government guidance. The Green Belt boundary depicted on the Area Local Plan is that preferred as it provides for both development and conservation objectives.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The Draft Plan does not clearly indicate the necessity for the houses proposed for St Andrews in Schedule H3. Any new housing will result in traffic choking of the town, which is not addressed in the plan.

Response:

The justification for the housing land requirement and medium scale allocations is contained in the Report of Survey. The nil requirement in the Approved Structure Plan, 2002 was informed by the 1998 Strategic Study. Significant changes have taken place in the interim, which require the provision of land for new development, including decreasing household size and the demand for affordable housing.

Any new development would be subject to policies in the Structure Plan and Area Local Plan that give full consideration to issues of transport and infrastructure provision.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The growth of the university is not taken into account regarding the housing of students which already exacerbates the housing problems of the town.

Response:

The Structure Plan and Area Local Plan were prepared in consultation with the University of St Andrews to take account of planned expansion in student numbers. The issue of Houses in Multiple Occupation is addressed in the St Andrews & East Fife Local Plan.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The affordable housing problem is not properly dealt with as there is nothing to stop prices rising after the first sales.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

Fife Matters makes no mention of provision for the welfare of the predominantly elderly population of the town.

Response:

This is not a strategic planning issue however it is intended that an appropriate level services and facilities will be provided.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Although stress is put on the development of St Andrews as a tourist centre, the mobility of tourists once in the town is not taken into consideration.

Response:

This is not a strategic land use planning issue and is more appropriately addressed by the Local Transport Strategy, the Area Transport Plan and to a lesser extent the Local Plan.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Fife Matters makes no provision for the schooling of children for the a greatly expanded population which is proposed.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The special character of St Andrews will be severely threatened if the issues in response 0475 comments 01-07 raised are not addressed. All together the proposal of the various plans considered at present time show no attempt to co-ordinate actions in order to secure the welfare of the current inhabitants.

Response:

Disagree. The Plans indicate that the development proposed for St Andrews can be achieved in planned manner taking full account of the need to enhance St Andrews. Fife Council is involved with a number of other agencies to ensure a joined up timeous delivery of infrastructure and services to benefit everyone in St Andrews.

Action:

Barrow, G W S - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Concerned about the proposal to provide for or encourage the building of 1800 new houses in the next twenty years. Such a proposal would produce a major and drastic change in the character of the town, a change which would in many ways be unnecessary and undesirable.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Storey, F D - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Agree that the provision of long term affordable housing is probably the most single important development issue in the St Andrews area. However concerned that the 45% of housing in new developments which is to be designated as affordable is not adequately defined anywhere in the plan.

Response:

Affordable Housing is a very important issue in the St Andrews Area. The percentage requirement for the area has been reviewed and is set out in the Finalised Structure Plan and Supplementary Guidance. This requirement will be applied as set out in these documents. The definition used is consistent with Scottish Executive guidance and advice (SPP3 and PAN 74). The definition of affordable housing is given in the glossaries of the Finalised Structure Plan and Supplementary Guidance. In terms of low cost housing for sale, definitions and target prices are set out in the Implementation Guide on Affordable Housing published by the Council's Housing Service.

Action:

Change percentage requirements in Finalised Plan Policy H4 (Draft Plan Policy H5).

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

It is possible through appropriately framed housing association leases and sales etc to prevent affordable houses from being sold on at full market prices. This mechanism should have been incorporated into the structure plan. In addition there should have been an emphasis (perhaps with a quota) on housing provision for rent only, as this could have presented the likely medium term effects on the local housing market.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the Council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing. The control of Housing Association leases and sales however is detailed and not a land use planning matter and therefore outwith the scope of the Structure Plan. The Council's preference is that 65% of affordable housing should be in the form of social rented provision, but inevitably meeting this "quota" will depend by the availability of Communities Scotland funding.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The present critical situation is partly a result of the selling on of ex council properties since the 1990s and the Structure Plan seems to do nothing to prevent this from occurring again.

Response:

This is not a strategic land use planning matter. However the Council has applied to the Scottish Executive to suspend right-to-buy in pressured areas of Fife.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

It is doubtful whether the infrastructure of St Andrews can support development on the scale proposed. If as appears to be the case that the proposed rate is essentially an extrapolation of previous growth in the town over the last twenty years it is anticipated that the obvious deterioration of the local environment that has taken place over the last twenty years will continue. Based on this experience the area will be unable to absorb a similar level of expansion over the next twenty years without potentially catastrophic consequences.

Response:

Housing need figures for St Andrews calculated by Fife Council using Scottish Executive approved methods. The numbers have been reviewed and included in the Finalised Structure Plan. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

Housing allocation in St Andrews reduced to 1,200 houses.

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

In 1998 Fife Council accepted that St Andrews was already close to its limits in terms of landscape capacity. It is not clear why it has changed its opinions so radically when no new factors seem to have been introduced into the situation.

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Given both the well documented overcrowding in the existing secondary schools and the proposed scale of new housing developments it would seem sensible for the Structure Plan to incorporate proposals for the building of a new secondary school in the Tayport/Wormit area.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Fife Matters together with the Local Plan indicate that new development in the St Andrews area can only be achieved by the exploitation of all available land not directly protected by the Green Belt. In addition there is concern that the Green Belt as proposed is not contiguous with the boundary of present housing. There is concern that the main beneficiaries of the Council's change of heart since 1998 appears to be developers who seem likely to take advantage of the change.

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements. The boundary of the St Andrews Green Belt is delineated for the first time in the draft Local Plan. The Green Belt is designated to provide for necessary development and secure other policy objectives.

Action:

Eynon, Mary - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

With regards to proposed housing in St Andrews it is unclear how issues such as protection of the environment, traffic, water provision, waste disposal and education provision will be dealt with.

Response:

The specific allocation of land for future development is a function for the Local Plan process. Full account has been taken of the important requirements and this will be addressed in detail via Local Plan, masterplans and development briefs. Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Houses in Multiple Occupancy

Comment:

Should not the landlords of student housing pay business and water rates?

Response:

This is not a land use planning issue.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Fife Matters focuses on tourism however it is not clear exactly where people will want to come and visit. In the St Andrews scenario, shops are being closed, the rail link does not exist any more and existing hotels are being converted into expensive housing and other established businesses are being driven out of the town to provide land for housing development.

Response:

St Andrews is recognised as an important destination for visitors to Scotland. Whilst there are a number of changes, compensatory changes, such as new tourists accommodation, are happening to address them. The Finalised Structure Plan addresses the issue of a rail link at Proposal PT1 (Draft Plan Proposal PT2) and the provision of employment land at Proposal PE1.

Action:

Tombs, Dorothy - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

In view of the stance taken in the St Andrews Strategic Study published in 1998 it is surprising that after only 7 years Fife Council is going against the study. It is considered that this will only result in ruin for St Andrews as it now is. In addition there is concern that these catastrophic changes are being made by people outwith St Andrews and do not seem to value opinions of the residents. It is unclear how St Andrews can possibly cope with such an influx of people and vehicles when it is obvious that the town is struggling to cope at present.

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

There is no convincing reason why St Andrews needs up to 1800 new houses.

Response:

The Report of Survey sets out the detail of the housing land requirement and allocations, with the scale of development proposed for St Andrews appropriate to meet local needs over the period 2006-2026. The scale of housing proposed for St Andrews is to meet primarily locally-generated needs over the Plan period 2006-2026. Finalised Plan reduces the allocation of houses from 1,000 to 1,800 to 1,200 houses.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Crichton, R F - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Fife Matters does not clearly indicate how the housing land requirement figure of 1800 houses for St Andrews has been derived. In addition, it is not clear whether the base population figures includes students, nor whether the University's plans have been taken into account in arriving at this high figure for new housing.

Response:

The Report of Survey sets out the detail of the housing land requirement, allocations and demographic background, with the scale of development proposed for St Andrews appropriate to meet local needs over the period 2006-2026.

Action:

Priest, Eric & Clare - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The proposed expansion of St Andrews is out of all proportion to the needs and interests of the town, both locally and nationally.

Response:

The proposed housing development at St Andrews is aimed at meeting locally-generated needs over the Plan period 2006-2026. The justification for the housing land requirement and allocations is contained in the Report of Survey.

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

The problems of traffic congestion are already massive. Any further expansion must make provision for a rail link of some type, more parking provision on the perimeter of the town and free or subsidised shuttle bus services to and from car parks.

Response.

Noted. Further expansion of St Andrews is not dependant on the provision of a rail link to the town. Proposal PT1 of the Finalised Structure Plan (Draft Plan Proposal PT2) confirms support for further consideration of options to link St Andrews to the rail network, to be progressed through the Local Transport Strategy. Detailed parking and public transport issues are addressed via the Local Transport Strategy and Area Transport Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Safeguards must be in place to provide long term affordable housing.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

The secondary school is overflowing already. Where is the proposal for another secondary school in North East Fife?

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

There are inadequate safeguards in place to protect the beauty and character of St Andrews, the coastline and other conservation areas.

Response:

The beauty and character of St Andrews will be protected via the controlled release of development land and the development of the St Andrews Green Belt in the St Andrews and East Fife Local Plan. The control over development of the coastline is the subject of policies in the Approved Fife Structure Plan 2002 which are to become core policies in the emerging Local Plans. Conservation Areas remain protected via legislation and existing and new Local Plan policies.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Not against all expansion, but the scale of expansion proposed for Sty Andrews runs the risk of spoiling irreversibly this priceless jewel in Fife. It is not obvious that this plan is either necessary or well thought out. In order for St Andrews to remain a resource for Scotland as a whole, careful and imaginative planning, which does not damage the character of the town and the beauty of its environment will have to be a dominant consideration rather than the possible short term economic gain for Scotland as a whole.

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The present situation (need for affordable housing) is unsustainable and ignores the needs of local people on low wages and incomes.

Response:

Fife Council is well aware of the shortage of affordable housing and the need has been quantified through the updated Housing Needs and Affordability Study. The Council is pursuing a range of mechanisms to address this, including use of the land use planning system. The need for affordable housing is one of the key challenges for the new Structure Plan.

Action:

Hodge, J.L. - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

With regard to Draft Plan Policy H5 it appears that if 45% of the provision is affordable housing this suggests that 55% of the housing will be of an executive type leading to speculative building.

Response:

Following the publication of PAN 74, the percentage requirement for the St Andrews housing market area has been reviewed. The mainstream housing will comprise a range of house types, not merely executive housing. The aim should be to achieve a mixed and balanced development with a range of house types.

Action:

Change percentage requirements in Finalised Plan Policy H4 (Draft Plan Policy H5).

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The Strategic Study of 1998 describes St Andrews as being at its landscape capacity yet in 2005 it appears that the capacity has increased dramatically to absorb additional housing by 2026. Where is the landscape change to justify this?

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements. Housing allocation for St Andrews reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Proposals for the St Andrews Green Belt omit essential Green Belt policies contained in the Scottish Office Green Belt circular of 1985 and the reasons for this omission should be explained.

Response:

The detailed Green Belt policy guidance is contained in the Draft Area Local Plan which complies with Government guidance.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Great emphasis has been placed on the value which would be placed on comments/criticisms put forward in response to the consultation - it is hoped that this will be the case.

Response:

All comments have been given full consideration prior to finalising the Structure and Local Plans, although they will not always result in a change to the Plan.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

With regard to the meeting in St Andrews on 20th April 2005 particularly unimpressed by a planning officer at that meeting who consistently failed to answer direct questions. Of particular concern was an inability to provide detailed population information broken down to give an indication of resident and student population numbers. This raised particular concerns about the accuracy of the housing land requirement figures.

Response:

Most of the questions posed were answered however, in many instances, the answers given were not those the questioner wished to hear. The Finalised Structure Plan and the supporting documents such as the Report of Survey explain how the housing land requirement numbers were set. These numbers have been subject to review and revision. Housing allocation for St Andrews reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

How does Fife Council propose to ensure that long term retention is ensured for affordable housing?

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

Guy, R N - Springfield, Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Totally opposed to any housing in excess of 3 houses in or around the village of Springfield.

Response:

Opposition noted. Detailed allocation of land for housing in the Springfield area is an issue for the Area Local Plan.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is considered the housing allocations for St Andrews and the Leuchars/Guardbridge area are significant. In fact the medium scale proposal for St Andrews is potentially much larger than the large scale proposals for Lochgelly and Levenmouth (see schedules H2 and H3).

Response:

St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. The Fife wide approach has been to classify the areas in absolute terms.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Apart from a possible rail link between St Andrews and Leuchars there is no strategy for improving transportation links in this area, despite the consequential increase in pressure on the St Andrews to Dundee and St Andrews to Cupar routes.

Response:

Disagree. See proposals contained in Local Transport Strategy and Area Transport Plan.

Action:
No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

With regards to Policy DC1 there is nothing new in developers providing the infrastructure within their developments. However to anticipate contributions from them for strategic infrastructure improvements, often far outwith their sites, amounts to another form of taxation and this may be counter productive. Developers, who are not known for their largesse, are likely to seek to recoup their costs by raising the selling price for their houses so that new homes will become even less affordable. Small developers may not be able to carry additional up front charges, so the number of firms and the development industry could cease with a consequential reduction in competition.

Response:

Finalised Structure Plan sets strategic Policy approach. Detailed discussions will follow once the process has been advanced via Area Local Plans, Master Plans and development briefs. Finalised Plan Policy DC1 and Proposal DC1 provide details at an early stage in the planning process to both assist the development industry and provide clarity in terms of requirements.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

With reference to Draft Plan Policy H5 it is contended that Springfield should be allowed to develop with a low level of affordable housing (10% - 20%) so that it more readily compares with other settlements in East Fife. In addition it is further considered that in the interest of social inclusiveness, that these low cost houses should be spread about the development and not built in one group.

Response:

This is not a Strategic Planning issue, and as such is more properly addressed by the St Andrews and East Fife Local Plan. Comment will be considered in that context. Agree however that affordable housing should be well integrated into and distributed within communities. Percentage requirement for the Cupar housing market area has been revised to 20% in the light of the updated Housing Needs and Affordability Study, PAN 74 and the public consultation. Draft Plan Policy H5 now Finalised Plan Policy H4

Action:

Revise Finalised Plan Policy H4.

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Despite the strategy with regards to wider Fife settlements it is concerned that these have been totally ignored in the delineation of land for housing in the Springfield area. The result is that there is now a credibility gap and a suspicion that the sentiments expressed are deployed merely to beguile at the public.

Response:

The housing land requirements for the Springfield area will be addressed in the Area Local Plan. (See Schedule H1, Draft Structure Plan).

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

On the basis that 6648 houses will be built in the St Andrews and East Fife area and applying a household size of 3.008 it is considered that the population of this local plan area will grow by 20,000, which is the total increase envisaged for the whole of Fife by Fife Matters. Not withstanding that demographic trends indicate that future households will on the average be smaller and that some of these new houses will be occupied by people who already live in Fife, it must be clear that there will be a significant increase in the population of East Fife if all these houses are built and occupied. This raises two questions: a) where will these extra people come from? And b) what employment opportunities will be available to them?

Response:

The average household size will fall over the plan period. The projected household size for 2006 is 2.17. By 2016 this is projected to be 2.02. Over the timespan of the Structure Plan it is projected to average 2.0 people. This contrasts with the estimated household size of three that you have applied.

The second factor to take into account is that this reduction in average household size applies to all households. Without new housing the population of East Fife would fall as fewer people stay in the existing stock. It is the reduction in the household size that is the main driver for new housing. When this change is factored over the whole housing stock, it tends to be a more significant factor than inward migration (unless inward migration is very high).

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

It appears that many of the proposed in-migrants to East Fife are expected to be a) commuters who will work outwith the area which will add pressures to transport routes; b) elderly/retired. This will place additional demands on medical and care services, topic which receive little attention in the plan and c) young, or unemployed or otherwise economically inactive people. This will add pressure to education and other social services, topics which again receive little attention in the Plan.

Response:

It is intended that the appropriate infrastructure and services will be in place timeously to provide for the needs of those moving to live and work in Fife.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Some of the new population of East Fife will migrate into the area from Mid Fife, just as they do now. The provision of large numbers of houses in East Fife will facilitate this unless A) the house building programme for Mid Fife starts well before and continues at a better rate, than the programme for East Fife so that people are not attracted out of Mid Fife by easier access to housing elsewhere. B) a major new form of employment is introduced into Mid Fife.

Response:

Housing land allocations, which support growth in Mid Fife, are shown in Finalised Plan Proposal H2. Finalised Plan also seeks to encourage new employment into Mid Fife.

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

The credibility of both the Structure Plan and Local Plan is undermined because A) there is no accompanying plan detailing the infrastructure changes needed to support large numbers of houses in specified settlements. The brief comment that there is, regarding strategic infrastructure changes, gives no detail about their costs, even though the infrastructure changes may be very expensive e.g. a new multi modal Forth Bridge. B) there is no detail about how these infrastructure changes will be financed, except that developers will be expected to make contributions. There is no indication of how these funds would be managed.

Response:

Restrictions must be removed where they occur. Increased sale prices for some properties would not apply to affordable housing element of a development. The Action Plan must be revised every two years and more detailed costs will emerge as greater detail is obtained. Public expenditure programmes tend not to be long term.

Action:

Seymour, P H K - Springfield, Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Oppose proposals to build houses in Springfield because it is considered there is inadequate facilities and services to support the increased population. In addition there is no justified demand for new housing in Springfield based on local work opportunities.

Response:

Noted. This is not a Structure Plan issue, matters of detailed land allocation are more properly addressed by the St Andrews & East Fife Local Plan. Comments will be considered in this context.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Water and Drainage

Comment:

Drainage infrastructure is inadequate to support expansion of housing in Springfield.

Response:

Finalised Plan Policies DC1 and C1 seek to ensure that appropriate infrastructure is provided in support of development. Further policy support is outlined in the St Andrews and East Fife Local Plan.

Action:

Seymour, M J D - Springfield, Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Oppose proposals to build houses in Springfield because it is considered there is inadequate facilities and services to support the increased population, and, the possibility of vandalism.

Response:

Noted. This is not a Structure Plan issue, matters of detailed land allocation are more properly addressed by the St Andrews & East Fife Local Plan. Comments will be considered in this context.

Action:

Dawson, Carol - Springfield, Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is considered that there should be no housing above five houses and definitely no large scale developments in Springfield.

Response:

Opposition noted. Detailed allocation of land for housing in the Springfield area is an issue for the Area Local Plan.

Action:

Dalrymple, Irene - Springfield, Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Concerned about the scale of development proposed for Springfield on the basis of lack of capacity in the drainage/sewage system, increased traffic, school capacity and the lack of recreational facilities in the village for young people at present. Concerned that the introduction of large scale developments into a village of the size of Springfield they mean the village loses its identity. It is accepted that all the villages and towns must develop but by doing so at a slow rate and a smaller scale is more beneficial to both existing villagers and to new people moving into the area.

Response:

Concerns noted. This is not a Structure Plan issue, matters of detailed land allocation are more properly addressed by the St Andrews & East Fife Local Plan. Comments will be considered in this context.

Action:

MacNaughton, K - Springfield, Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Infrastructure

Comment:

Not opposed to houses being built in Springfield but the amount that is proposed is ridiculous and it is unclear who will pay for the provision of new facilities and services.

Response:

Paragraphs 3.6 - 3.10 of the Finalised Plan together with Action Plan explain the proposed sources of funding for new facilities and services.

Action:

Castellucci, Paul - Springfield, Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Springfield already has a high percentage of rental/affordable housing therefore why is it proposed to build more houses in this location.

Response:

This is not a strategic planning issue, and as such is more properly addressed by the St Andrews and East Fife Local Plan. Comment will be considered in that context.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Facilities in Springfield would be inadequate to service the scale of development proposed in particular roads, sewerage, education and transport are inadequate. In addition problems of antisocial behaviour which could possibly be improved by improving very poor primary school buildings, should be addressed before any large scale development is considered.

Response:

Noted. This is not a Structure Plan issue, matters of detailed land allocation are more properly addressed by the St Andrews & East Fife Local Plan. Comments will be considered in this context.

Action:

Mitchell, Valerie - Springfield, Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Large-scale development in Springfield will alter the village beyond recognition and destroy the existing friendly community. In addition there is no local employment opportunities which justifies the additional housing proposed.

Response:

Opposition noted. Detailed allocation of land for housing in the Springfield area is an issue for the St Andrews & East Fife Local Plan. Comments will be considered in this context.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Increasing the size of Springfield by 150-270 houses would almost double the population making extra demands on public services.

Response:

It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Public Transport

Comment:

It is considered the public transport links to Springfield despite it having a railway station are particularly poor. The area would not provide suitable accommodation for those considering to live in Springfield and commute by public transport to employment elsewhere.

Response:

Concern about public transport links to Springfield and its unsuitability for commuters using public transport noted.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Strict criteria should apply to eligibility for social housing to avoid anti-social behaviour.

Response:

Noted, but this is not a land use planning issue. Eligibility criteria is set out in the Implementation Guide published by the Council's Housing Service.

Action:

Green, Isabel - Springfield, Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Accept that there is a need for new housing in North East Fife however it should not be on the scale proposed for Springfield. New housing in Springfield would have significant impact on the village infrastructure including transport, drainage, sewage and education.

Response:

Noted. Detailed allocation of land for housing in the Springfield area is an issue for the St Andrews & East Fife Local Plan. Comments will be considered in this context.

Action:

Lindsay, J - Springfield, Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Public Transport

Comment:

The public transport service from Springfield via rail is totally inadequate and excessively expensive. Springfield is to be developed and the public transport system must be improved as it is anticipated that most of the new residents would be commuters.

Response:

Concern about public transport links to Springfield and its unsuitability for commuters using public transport noted.

Action:

Russell, Lorna - Springfield, Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Accept that there is a need for new housing in North East Fife, however it is considered that the scale of that proposed in Springfield is excessive.

Response:

Noted. Detailed allocation of land for housing in the Springfield area is an issue for the St Andrews & East Fife Local Plan. Comments will be considered in this context.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Considered that the development in North-East Fife will result in further increases in traffic passing through Springfield creating major problems in rush hour periods.

Response:

This is not a Structure Plan issue and will be considered by the St Andrews and East Fife Local Plan.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Water and Drainage

Comment:

There is a need to upgrade drainage/sewage facilities throughout the village of Springfield.

Response:

Finalised Plan Policies DC1 and C1 seek to ensure that appropriate infrastructure is provided in support of development. Further policy support is outlined in the St Andrews and East Fife Local Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

There is a need to provide a new school to bring all the pupils under one roof and do away with temporary huts.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

Paton, Yvonne - Springfield, Cupar

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The houses built by Kingdom HA are of poor quality and are very small.

Response:

This is not a strategic planning issue. Fife Council has published a new Design Guide to encourage good quality design.

Action:

Westcott, J - Dairsie, Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The plan is for developers and not for people who live in Fife. It is considered that new housing will only attract non Fife people and mostly from England. Houses will still be out of reach to Fife's young families. Our interests are what is important to Fife's young families. Our interests are what is important for North East Fife, not developers.

Response:

Disagree. The Plan is intended to secure a sustainable future for Fife addressing the immediate and longer term problems relating to the provision of employment and housing.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Object to the proposed plans as the secondary school education facilities are already at an extended capacity. This has been the subject of discussion already for a significant period of time and requires to be settled before increasing the population.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Built Environment

Comment:

Proposals to develop in Dairsie are considered to be inconsistent with guidance contained in the approved Fife Structure Plan 2002 which states that all new developments are expected to make a positive contribution to its immediate environment.

Response:

Policy DC1 in the Finalised Structure Plan states that for all new development the Council will seek contributions to address shortfalls in community infrastructure and to mirage against adverse impact from the development. Development proposals should satisfy this requirement.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

Object to the proposed plan as the influx of people in to North East Fife will only make the shortage of medical professionals such as doctors, and dentists more acute as dentists are already unable to accept new patients. Increased population will obviously have an impact on all medical centres in the area, whose services are presently stretched.

Response:

It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned. NHS Fife is aware of the proposals for growing Fife's population 2006-26.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Object to the proposed plan as employment opportunities are very limited. In view of a number of properties proposed for North East Fife it is not clear where all new inhabitants are going to find suitable employment. There is much debate on whether jobs follow people or whether people follow jobs however, it is considered prudent if the jobs should exist and waiting to be filled before people are brought into an area.

Response:

Fife Council and other agencies are working together to improve the Fife economy and create the conditions which will generate more job opportunities throughout Fife including North East Fife. Many potential employers locate in areas because of the available labour pool rather than move to an area in hope of recruiting people who have to move to the area.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Public Transport

Comment:

Object to the proposed Plan due to transport problems and associated green issues. At present there is inadequate public transport service never mind a frequent and convenient service for Dairsie. Living in the country requires personal transport which is costly and therefore perhaps it is not a close space option for those who might occupy affordable housing. In addition the more accommodation provided in the country will significantly increase the demand for fossil fuels and ever increasing prices and not everyone can afford

that.

Response:

Concerns about public transport services in rural areas, and in particular the Dairsie area are noted. Fife Council is working towards improving public transport services throughout Fife through the Local Transport Strategy.

Action:

Richmond, Laurina - Dairsie, Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Surely no extra traffic should be encouraged into Fife as both the Forth Road Bridge and the Tay Road Bridge must be at maximum capacity.

Response:

The Finalised Structure Plan gives support for a new multi-modal cross-Forth bridge and associated approach networks at Queensferry to address ongoing issues of capacity and maintenance. Wider transport issues are addressed through the Local Transport Strategy and through Fife Council's contribution to the Regional Transport Strategy. Transport modelling work in support of the Finalised Structure Plan,

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Consideration should be given to the construction of the Dairsie bypass as the level of traffic passing through the village between 4.30pm and 6pm is excessive.

Response:

This is not a Structure Plan issue and will be considered through the St Andrews and East Fife Local Plan and Area Transport Plan.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is considered that the development proposed for Dairsie is outwith the existing village envelope and would not be consistent with Policy SS1.

Response:

The delineation of village envelopes is function for Local Planning which will be revised to take account of proposed development.

Action:

Scottish Executive Development Department, Jobling, Ken - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

With regard to paragraph 2.5 re Dunfermline green wedges are referred to, but it is not clear whether these will be covered by Green Belt policy or designated as green wedges for other purposes. If it is Green Belt it may be preferable to say "green belt, in the form of green wedges, will be formed". This clarifies that you are talking about a Circular 24/85 type of policy designation.

Response:

Agree to clarification of this section of paragraph 2.5.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The Draft was genuinely welcomed and considered to be relatively concise and easy to read, and to address key issues in a strategic manner. There is a general welcome for the integrated approach to land use planning, economic development and transport planning, and to emphasis given to the importance of location and accessibility and the availability of all travel modes and considering land use allocations and proposed development. However, there is some wider concern about the deliverability of the ambitious proposals particularly in regard to transport infrastructure. The Strategic Rail Authority (SRA) supports in principle measures in the plan to encourage more sustainable modes of transport, to improve accessibility and to encourage the movement of freight by rail. Historic Scotland is concerned that because the major thrust of the plan is development, that the balancing responsibility to historic environment is not addressed with sufficient robustness.

Response:

The issue of movement of freight by rail is addressed in Finalised Plan Policy T3: Transport of Freight. The historic environment is not ignored and robust protective policies are Core Local Plan policies.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

There does see to be rather a lot in the introductory sections. In particular, whilst this is appreciated that the preface is meant to provide a wider context for the plan, a number of respondents mentioned that they find it rather confusing and inaccessible. It is considered that the first sentence of the third paragraph of the introduction might be better reworded to read "the National Planning Framework (2004) sets out a strategic vision to guide the spatial development of Scotland to 2025"

Response:

The paragraph as written explains the purpose of the National Planning Framework (2004) in general terms.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Chapter one picks up on the relevant messages from the National Planning Framework including the themes of quality and connectivity. The commitments to an action plan and the use of land assembly powers are welcome.

Response:

Support noted.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

With regards to paragraph 1.6 the middle of the seconds sentence might be less cryptic if reworded "good proximity to the cities of Edinburgh, Glasgow and Dundee and good access to Europe".

Response:

Agree to amendment suggested.

Action:

Reword para 1.6 as suggested.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

With regard to paragraph 1.16 while the National Planning Framework identifies Rosyth as an International Gateway, it may not be entirely accurate to refer to it as "a national transport hub".

Response:

Noted. However, in view of capacity of the port to accept additional services, there is scope to promote that Rosyth can play a role as a natural transport hub.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Given the sensitivities over development pressures, it might be better to indicate in the eleventh bullet point that the Structure Plan will "support the role of St Andrews as a world class tourist destination."

Response:

Finalised Plan at Para 1.14 refers to the role of St Andrews as a world class destination".

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

With regard to comments in paragraphs 1.16 and 1.19 a new multi-modal Forth crossing does not feature in the Scottish Executive's current transport delivery programme.

Response:

Noted. The Finalised Structure Plan is flagging up the need for additional capacity in the longer term.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

With regard to paragraph 1.22 perhaps there is a need to emphasise the importance of good quality design to reflect the contents of paragraph 4.33. Historic Scotland point out that innovative design in itself might be incompatible with historic settings.

Response:

Paragraph 4.33 as a preamble to Draft Plan Policy ENV3 makes it clear that the historic setting which is likely to encompass the townscape, adjacent buildings and open space, will be taken fully into account in assessing new development. Draft Plan Policy ENV3 will be included in Area Local Plans.

Action:

Draft Plan Policy ENV3 will be included in Area Local Plans.

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

With regard to paragraph 1.26 developing policies to reflect different types of rural area is one of the main thrusts of SPP15 and to an extent the Structure Plan policies do reflect a variety of issues facing different rural areas of Fife. As might be expected, the Structure Plan focuses strongly on delivering housing in existing settlements on a small number of large housing allocations in the identification of new housing clusters in rural areas is left to the Local Plan. Perhaps the Structure Plan could provide a better indication of the particular considerations that might be applied to proposals for housing in rural areas e.g. in terms of clusters, landscape considerations, connectivity, and other key issues raised in the plan. It could also provide clearer indications on the type of over development it has tried to avoid in areas such as East Fife.

Response:

SPP15 at paragraph 10 supports the Finalised Structure Plan's approval of concentration on the development of existing settlements. This is clearly carried forward in Finalised Plan Policy SS1 and this does make provision for justifiable departures being supported.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Chapter 2 requires to provide a clearer relationship between the Structure Plan and Local Plans - e.g. at paragraph 2.3. Does the Structure Plan have a role in this giving of priority when it does not allocate specific sites?

Response:

It is considered that this description is necessary for clarity.

Action:

No Change

Comment No: 12

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Is it necessary to use the phrase "Brownfield, vacant and derelict land" when the term Brownfield encompasses the other two.

Response:

It is considered that this wording is helpful to most readers of the Plan.

Action:

No Change

Comment No: 13

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It might be better to refer to housing allocations in terms of "homes" or "housing units" rather than "houses", as some development will presumably be flats. This comment is applicable to Chapter Three.

Response:

The word "houses" is considered to be applicable to all types of residential units.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

With regard to paragraph 2.2 rather than just cross referring, it might be better if the six strategic development areas and the eleven medium growth areas were mentioned. The strategic link with the Coastal Regeneration Zone could also be mentioned.

Response:

Suggested amendment to paragraph 2.2 is likely to resulting repetition of information about immediately following paragraph 2.2. In relation to cross-referencing the CRZ this has been achieved in paragraph 2.4 at bullet points 5 and 6. Medium Scale Housing designation has been dropped and all strategic scale proposals are set out in Finalised Plan Proposal H2.

Action:

All strategic scale proposals in Finalised Plan Proposal H2.

Comment No: 15

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

With regard to paragraph 2.4 it is not clear that the re-opening of passenger rail services between Kirkcaldy and Levenmouth has figured in any strategic consideration of the future rail network.

Response:

Proposal PT1 of the Finalised Structure Plan (Draft Plan PT2) refers to Proposals for re-opening Levenmouth rail line and land for stations.

Action:

No Change

Comment No: 16

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

With regard to paragraph 2.5 there are a number of references to key linkages to the public transport network without specification of what these are. If new rail stations are intended there would have to be considerable work to justify development. The idea of a light rail network in Dunfermline/South Fife area, linked to provision in Edinburgh, and therefore justifying a new Forth crossing, is also resurrected. This would be a major investment involving long lead times.

Response:

Text has been revised in Finalising the Structure Plan. The "justification" of a new Forth Crossing is not based on the idea of a light rail network in South Fife. It is highlighted in respect of its importance to the national economy.

Action:

More emphasis has been placed on city regions in finalising the Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

With regard to paragraphs 2.5-2.8 Historic Scotland emphasised the importance of safeguarding the setting of all the towns within their landscape, in line with policy ENV1, in particular, the views to Dunfermline Abbey from the South, South West and West, and the approaches to St Andrews from almost every route.

Response:

Historic Scotland's comment with regard to Dunfermline and St Andrews are addressed via Policy ENV1 and the detailed boundaries of the Green Belts delineated in the Area Local Plans will be addressed/are addressed in the Area Local Plans.

Action:

No Change

Comment No: 18

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

With regard to paragraph 2.7 the term " the town is subject to constant pressure for the development industry" is a little emotive and could be omitted as it adds little to the paragraph.

Response:

The paragraph as written reflects the views of Fife Council and many of the residents of St Andrews.

Action:

No Change

Comment No: 19

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Policy SS1 appears rather disjointed from the settlement strategy as set out in paragraph 3.2 and Policy SDA1 and it would be helpful to clarify the relationship. Although it is not entirely clear, it is assumed that the criteria in this policy will apply to the release of land under Policy SDA1.

Response:

Both Policy SS1 and Policy SDA1 indicate the role of the Area Local Plans in their implementation.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Suggest that "and their settings" be added to the bullet "damage to build heritage or natural environmental features" in Policy SS1. Although paragraph 3.1 refers to a balance, it is not clear how this will be reached in terms of relative weight to be attached to the various criteria in the policy. The lack of specific historic environment policies weakens the position of the historic environment in this balancing exercise.

Response:

The issue is addressed in Draft Plan Policy ENV3 and in Core Local Plan Policies to be included in every area Local Plan.

Action:

Draft Plan Policy ENV3 will be included in Area Local Plans.

Comment No: 21

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

With regard to Policy SS1 there are concerns about the bullet reference "the community benefits / gain can be maximised". The proper planning of an area should not be influenced in any way by inducements from developers and the wording should be checked against the terms of Circular 12/1996. This also related to the references in paragraph 3.4 to making good existing deficiencies in community infrastructure.

Response:

The Policy lists a number of items to be considered and the proper planning of an area via the Area Local Plans would not be unduly influenced by any of the bullet points in this section of the Policy. Paragraph 3.4 sets out the range of potential methods of achieving planning gain.

Action:

No Change

Comment No: 22

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

With regard to paragraph 3.2 not sure that there is any automatic link between development on brownfield sites and economic development.

Response:

Paragraph 3.2 links brownfield land to both economic and environmental improvement.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

With regard to paragraph 3.6 clarification of the phrase "affordable housing (beyond the identified need)" mean?

Response:

This refers to provision of affordable housing over and about the percentage requirement in the Finalised Structure Plan. For example in the St Andrews Housing Market Area the percentage requirement has been set at 30% although the true level of need is considerably higher. In this example it would mean any level of provision over 30%. It also refers to individual developments where a developer may offer a higher percentage.

Action:

No Change

Comment No: 24

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

With regard to Policy DC1 it is not clear what is meant by "their development and its surroundings".

Response:

Agreed. Finalised Plan DC1 revised deleting "and its surroundings".

Action:

Finalised Plan DC1 revised deleting "and its surroundings".

Comment No: 25

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Ambitious transport proposals are presented within the Plan, with long term commitments to modal shift. Whilst policy DC1 states that developer contributions will be sought to address any shortfalls in community infrastructure and/or mitigate any diverse impact brought about by their development, given the nature and scale of some of these proposals and the potential impact of the Plan allocations, it is likely that developer contributions alone will not meet the funding requirements. Also, there is no clear indication within the Plan of the sources of funding or the current stance of the Scottish Executive with regard to initiatives which involve the A92T and M90 corridors.

Response:

Details are set out in the accompanying Action Plan. Other partners will be involved including the Scottish Executive and others.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

With regard to paragraph 3.7 Local Plans should clearly set out the scope of key requirements for developer contributions, and this commitment may be undermined by the notion that it does not preclude requirements being refined later. This creates uncertainty and delays planning applications. Surely policies can be worded so that minor matters can still be negotiated later.

Response:

The Finalised Structure Plan sets strategic Policy approach. Detailed discussions will follow once the process has been advanced via Area Local Plans, Master Plans and development briefs. It is generally accepted that Structure Plans set out the strategic policy guidance and Local Plans more local policy guidance. It is often impossible to quantify works and costs in detail in the absence of more information.

Action:

No Change

Comment No: 27

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

It is suggested that there is a misprint in Policy DC2 first column which should read Dunfermline South West/North.

Response:

Agreed.

Action:

Amend text to read Dunfermline South West/West/North.

Comment No: 28

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

With regard to paragraph 3.8 etc the Strategic Development Area policy is disjointed from the allocation of land for business and industry in these areas. This probably reinforces divisions between housing developments and business and industry development and does not make most of the opportunity to encourage a mix of uses.

Response:

The Finalised Structure Plan seeks to secure the provision of an appropriate provision of new employment land in close proximity to housing development and with good connectivity. Supporting text has been amended to emphasise connection in para 3.26. Proposal PE1 also contains references to employment land in Strategic Development Area allocations.

Action:

Amend supporting text.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

It is considered that Policy S1 sounds a little grudging, and perhaps it should more positively welcome development for town centre type uses within town centres and indicate that Local Plans will encourage appropriate development in an identified network of centres.

Response:

Policy S1 requires to provide positive guidance. It should be read in conjunction with the preceding supporting paragraphs and the Plan's policy objectives. The Plan supports and promotes vibrant and diverse town centres. Reference to a network of centres has been inserted into supporting text.

Action:

No Change

Comment No: 30

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

It is questioned if there is a need for three separate policies S1, S2 and S3.

Response:

Combining all three policies would result in a lengthy policy with a consequent reduction in clarity.

Action:

No Change

Comment No: 31

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

With regard to the policy objectives in paragraph 3.32, the fifth bullet point seems to suggest that every housing development should include a mix of affordable to high end executive housing. Is this realistic?

Response:

The fifth bullet point encourages a mix of tenure in housing developments in order to promote mixed and balanced communities, it does not suggest that every development should include the full range suggested.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Policy H1 proposes a considerable amount of housing, particularly within Kirkcaldy and Mid Fife, with the potential significant impact on the surrounding trunk road network. Although the allocation of business land enables the potential of commuting to be reduced within specific areas, the overall allocation will not reduce the potential for significant commuter traffic on trunk roads. In line with para 59 of NPPG17, the authority should ensure that it has assessed the impact of their land use proposals on the strategic and local transport networks and identified any associated mitigation measures which may be required, including those not highlighted in the plan.

Response:

The Report of Survey details the justification for the housing land requirement and development strategy, with full consideration given to the requirements of SPP17. To support the development strategy and inform decisions on the most appropriate locations in transport terms for strategic land releases, Fife Council appointed Consultants in 2002 to build a transport model. The work included computer modelling and analysis of the potential likely impact on the strategic road network of Strategic Development Areas being considered in West and Mid Fife. Outputs from the modelling work have informed decision-making on strategic land releases and will assist in predicting future development impacts.

Action:

No Change

Comment No: 33

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

With regard to Draft Plan paragraph 3.34 there seems to be a slightly confusing relationship between the contents of Draft Plan paragraph 3.34, Policy H3 and Policy SS1.

Response:

Disagree.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Schedule 2 shows 330 units per year between the years 2016-2026 from the strategic area at Dunfermline. How realistic is this?

Response:

Proposal H2 of the Finalised Structure Plan assumes a significantly lower rate of completions than has occurred in Dunfermline Eastern Expansion in recent years. The average annual completion rate for 2000 - 2005 is 506 units per annum, with the Strategic Development Area averaging some 228 units per annum (or 330 between 2016-2026).

Action:

No Change

Comment No: 35

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

With regards to paragraph 3.42-3.44 and policies H5 and H6 it is considered that these should be reviewed in line with PAN74. The requirement for contributions to facilitate wider community regeneration is outwith the scope of PAN74, are not encouraged. Policy H6 cannot be supported within current policy.

Response:

PAN 74 was published after the consultative draft Structure Plan was approved. It has been taken into account in the Supplementary Guidance on Affordable Housing and in the Finalised Structure Plan. The percentage requirements have been adjusted in light of this together with the updated Housing Needs and Affordability Study and the public consultation. Policy H6 of the Draft Structure Plan has been deleted but a text reference to provision from non-residential development is retained.

Action:

Review Policy H4 (previously H5) in line with PAN 74 and Delete Draft Plan Policy H6.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

With regard to paragraph 3.46 etc consider the transport improvements proposed in the Plan are extensive and present a long term commitment to modal shift for the area. However, the deliverability of some of the more ambitious schemes is not dealt with and some, such as a new multi modal crossing of the Forth must be questionable. Shorter term solutions are therefore likely to be required to mitigate the plan proposals, which could lead to significantly increased commuting along key trunk road corridors. Paragraph 61 of NPPG17 states that plans should aim to reduce the need to use trunk roads and other routes for short local journeys. Any improvement or alteration to the trunk road network is subject to Scottish Executive approval and currently there is no commitment to funding or programming of the A92T or M90 initiatives presented in the document. It must be stated within the plan that the Scottish Executive does not have any commitment to works associated with these proposals regarding funding or programming.

Response:

The Finalised Structure Plan lists in Proposal PT1 (Draft Plan Proposal PT2) the key strategic transport projects for Fife over the Plan period 2006-2026. The Structure Plan Action Plan details the current position in relation to transport proposals and primary funding and is subject to biennial review. This issue is more appropriately addressed through the Local Transport Strategy and Area Transport Plans.

Action:

No Change

Comment No: 37

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

With regard to Draft Plan Policy T3 the Strategic Rail Authority is strongly supportive of integrating land use and transport issues and agrees that development proposals clearly benefit from being supported by transport assessments and travel plans where appropriate. However, development should make an appropriate contribution to transport enhancements if required as a result of increased pressures on facilities/services arising from development proposals. It is important that such polices are included to enable contributions to be sought towards improving sustainable transport to achieve the desired balance between land use planning and transport issues.

Response:

Support noted. The Action Plan deals with programming/funding issues for major infrastructure investment. Finalised Plan Policy DC1 includes support for Transport Assessments and Travel Plans where appropriate, and the provision of necessary on and off site infrastructure in support of development. Finalised Plan Proposal DC1 identifies specific Developer Requirements for the Strategic Development Areas and Other Strategic Land Allocations.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

With reference to Draft Plan Policy T4, the protection of the disused rail network may only be inappropriate where there is a reasonable possibility of re-use for transport purposes over the period of the Plan taking into account guidance form the rail authorities.

Response:

The Structure Plan seeks to ensure that potential for improvements to the transport network is not prejudiced by development. As such, Finalised Plan Policy T2 (Draft Plan Policy T4) safeguards specified routes and land from development that may prejudice their existing or future transportation use.

Action:

No Change

Comment No: 39

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

With regard to Draft Plan Proposal PT2. This contains a long list of rail proposals which go well beyond any current rail studies and might have significant network repercussions. With the respect to the provision of new stations, the Strategic Rail Authority published policy and guidance in September 2004 which could be referred to in the plan.

Response:

The detailed issues such as Strategic Rail Authority policy and guidance on new stations would be best addressed via the Local Transport Strategy and/or Area Transport Plans. Draft Plan Proposal PT2 now Finalised Plan Proposal PT1.

Action:

Revise Finalised Plan Proposal PT1.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

With regard to proposal PT2 there are particular concerns about the following:

- 1. a new multi-modal cross/Forth Bridge and associated approach networks. This initiative should not be regarded as a firm Structure Plan proposal with regard to funding or programming. There is no scheme included in the trunk roads programme to accommodate any infrastructure associate with this project.
- 2. the Park and Ride and/or chose facilities/interchange at Tay Bridgehead and Halbeath. It is likely that a commitment to trunk road A92 access will be required before such facilities can be implemented. These schemes and potential access arrangements are not included in the current trunk road programme nor has any commitment been made.
- 3. the improvements to Redhouse A92 to Gallatown corridor, possibly with the reference to the A921. There is no scheme for improvement to Redhouse roundabout A92 included in the current trunk roads programme.
- 4. a high occupancy vehicle (HOV) lane on the M90. There is no scheme to imply that such a proposal in the trunk roads programme and the feasibility of this option has not been established. It is not considered appropriate any of the above be considered as firm PT2 proposals at present. In addition, the provision of symbols on the key diagram making reference to strategic transport proposals should be addressed appropriately.
- 5. In addition Historic Scotland also points out that a new Forth crossing could have significant implications for the historic environment.

Response:

Proposal PT1 of the Finalised Structure Plan (Draft Plan Proposal PT2) lists the key strategic transport proposals for the Plan period 2006-2026.

- 1. The Finalised Structure Plan supports the provision of a new multi-modal cross-Forth bridge and associated approach networks at Queensferry, to serve Eastern Scotland and to assist in growing Fife's economy. Further studies are ongoing to assess future options and the Structure Plan outlines Fife Council's position in relation to support for an additional crossing.
- 2. Proposal PT1 of the Finalised Structure Plan (Draft Plan Proposal PT2) refers to support for proposals that enhance connectivity along key corridors, including improvements to the A92. The project and funding will be progressed through the Local Transport Strategy.
- 3. Proposal PT1 of the Finalised Structure Plan (Draft Plan Proposal PT2) and the Action Plan identifies the key strategic transport proposals, phasing and proposed funding for the Structure Plan period. These reflect the content of the Local Transport Strategy.
- 4. Work is ongoing to provide and additional land on the A90 between Admiralty and Ferry Toll.
- 5. An additional Forth Crossing would be subject to Environmental Impact Assessment, which would give full consideration to impacts on the historic environment.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

With regards to Draft Plan paragraph 3.52/Policy T2. Although the emphasis on rail and water is welcome, the great majority of freight will travel by road. The local transport strategy should address detailed road freight delivery issues. The establishment of Freight Quality Partnerships with the freight sector should also be examined. The Strategic Rail Authority would like to see a more positive policy actively encouraging freight movements by rail.

Response:

These issues will be addressed through the Local Transport Strategy.

Action:

No Change

Comment No: 42

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Rural Economy

Comment:

With regard to Draft Plan Policy E3 it is disappointing that the positive policy messages set out in Draft Plan Policies E1 and E2 (and which are in line with the positive vision with SPP15 which encourages planning authorities to support a wide range of economic activity in rural areas) are not continued in Policy E3, which does not support businesses if they could be located in a nearby settlement. Such a blanket restriction is not consistent with SPP15 and several examples are provided in PAN 73 of businesses which have been located outside settlements.

Response:

Draft Plan Policy E3 will be incorporated into Local Plans and has been deleted from the Finalised Structure Plan to avoid any unnecessary duplication.

Action:

Draft Plan Policy E3 will be incorporated into Local Plans.

Comment No: 43

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Minerals

Comment:

With regard to paragraph 4.10 should the word "extraction" be added at the start of the second sentence?

Response:

Fife Minerals Subject Local Plan provides the main policy framework for considering mineral extraction proposals. In addition, other policies make provisions for protecting the historic and natural environment, therefore no need to duplicate advice in every policy. For similar reasons there is no need to amend Policy M1 to make it similar to Policy M4.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Minerals

Comment:

With regard to Policy M1, the acceptance in Draft Plan Policy R3 that minimising any adverse impacts on the environment applies to both the historic and natural environment is welcomed. Should there not be a similar reference in Policy M1? Or perhaps a reference to compliance with the development strategy, as in Policy M4?

Response:

This issue is covered in more detail by the Minerals Subject Local Plan.

Action:

No Change

Comment No: 45

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Minerals

Comment:

With regard to paragraph 4.13, this appears a little loosely worded towards the end and gives the impression that it is possible to buy planning permission. The last sentence could be revised to read "whilst focussing mainly on mitigation at affected communities to support appropriate projects such as providing and sustaining community facilities, the Fife Minerals Trust Fund could assist community projects of lasting benefit throughout Fife."

Response:

Paragraph clarifies that some operations and disruption may be temporary. Current wording of final sentence is consistent with this.

Action:

No Change

Comment No: 46

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Minerals

Comment:

With regard to Policy M4, it is the Executive's policy that planning authorities should identify areas of search. Outwith these areas, there should be a presumption against the extraction. Policy M4 appears to be saying that proposals outwith the areas of search, and previously unknown deposits, will be supported in certain circumstances. The purpose of the broad Areas of Search is to provide as much certainty to local communities as possible and the Fife approach is likely to undermine this. The finalised SPP16, which will clarify some aspects of policy should be issued in July.

Response:

Wording has been amended slightly to clarify that in general there is a presumption against operations outwith Areas of Search, albeit with limited exceptions.

Action:

Amend Policy M4.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Waste Management

Comment:

With regard to paragraph 4.16 of Draft Plan it might be useful to include a brief sentence of how much waste arising Fife has, how the waste is currently disposed, the capacity of these facilities and what infrastructure will be needed to move away from landfill to implement the area waste plan for municipal solid waste.

Response:

Such background information more appropriate for inclusion in Report of Survey.

Action:

No Change

Comment No: 48

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Waste Management

Comment:

With regards to paragraph 4.16 of Draft Plan it is suggested that the last sentence should read "Targets for the UK emerging from European Union directives mean, amongst other things, that by 2010 the quantity of biodegradable municipal waste that is sent to landfill must be reduced by 75% of that produced in 1995, by 2013, 50% and by 2020, 35%. The Fife area waste plan aims to achieve if not better those targets."

Response:

The Structure Plan sets out Fife Council's strategic framework to meet the targets set over the Plan period.

Action:

No Change

Comment No: 49

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Waste Management

Comment:

With regard to paragraph 4.21 of Draft Plan this says that the Westfield facility could provide facilities for East and Mid Fife while Proposal PW1 says that further facilities will be identified through the Local Plans. This seems a little contradictory. If there is a need to identify locations or location criteria for East and Mid Fife in the Local Plan, it would be useful to lay down a time scale in the Structure Plan for doing this.

Response:

Proposal PW1 will be deleted and Policy W1 revised to provide guidance for a strategic network of waste management sites. Preference will be given to Lochhead, Melville Wood and Westfield. The Fife Area Waste Plan and the Local Plans will identify timescales and the sites.

Action:

Proposal PW1 will be deleted and Policy W1 revised.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

With regards to paragraphs 4.24 etc there is no specific landscape policy other than that covering the landscape setting of St Andrews and Dunfermline (ENV1). There are regional and local designations including AGLVs which Fife Council, and SNH are keen to review. A policy protecting and enhancing Fife's overall landscape, supporting the first policy objective in paragraph 4.424 and complementing the more general nature conservation Draft Plan Policy ENV6, would not be out of place.

Response:

Finalised Plan Policies ENV2 and ENV3 seek to protect nature conservation areas with International and National protection status respectively. Areas of more localised importance to nature conservation are protected by Local Plan policies. Policy SS1 requires the full consideration of a number of factors including nature conservation. Local Plan reviews will consider landscape policy.

Action:

No Change

Comment No: 51

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

With regards to paragraph 4.24 etc. Whilst the policy objective on "protecting and enhancing the historic and built environments which give Fife its sense of place" is included in paragraph 4.24, there are no actual policies beyond the very specific ENV1. Therefore, you may like to consider whether the requirements of NPPG5 and NPPG18 have been met.

Response:

Agreed to extending reference to Nature Conservation (Scotland) Act 2004.

Action:

Amend supporting text to Finalised Plan Policies ENV2 and ENV4 to emphasise the Act.

Comment No: 52

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Natural Environment

Comment:

With regards to paragraphs 4.24 of Draft Plan etc there are references to biodiversity under 4.24, 4.38 and 4.43 of Draft Plan. Mention is made of the Nature Conservation (Scotland) Act 2004. The last sentence of 4.38 of Draft Plan should be expanded to indicate the act places a statutory duty on the Council to further biodiversity interests.

Response:

Agreed.

Action:

Amend text of Para 4.10 of Finalised Plan to mention Act.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

With regard to policy ENV1 it is suggested that this policy takes a stronger line on development in the Green Belt. At the moment it does not reflect the strong presumption against unless for agriculture, horticulture etc. In addition it may be better to position the ENV1 policy box after paragraph 4.29, otherwise paragraph 4.29 reads as if it only relates to Green Belt in Dunfermline.

Response:

Policy ENV1 in the Finalised Structure Plan makes it clear that the delineation of Green Belt should ensure conservation objectives yet accommodate any appropriate new development. The policy is designed to facilitate the delineation of Green Belts for St Andrews and Dunfermline. Further detailed Policy guidance is a matter for Local Plans.

Action:

No Change

Comment No: 54

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Design Quality

Comment:

With regard to paragraphs 4.33-4.35 the separate guidance for "urban" and "edge of settlement" and "rural" areas is confusing. For example, should a proposal on the edge of a settlement not be encouraged to take account of the physical and heritage assets, adjacent buildings and open spaces? Why just urban? The first two sentences in paragraph 4.33, which stated that design is a material consideration and all development must make a positive contribution to the surrounding environment and cover the essential matters. If all the paragraphs are retained, it might be helpful to link the first or third paragraph as they both relate to the urban environment.

Response:

The principles contained in the document will be a material consideration in all instances. Draft Plan Policy ENV3 will be included in Area Local Plans.

Action:

Draft Plan Policy ENV3 will be included in Area Local Plans.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Design Quality

Comment:

With regard to Draft Plan Policy ENV3 the wording of this policy seems a little like convoluted. Surely it is for applicants to demonstrate that they have pursued and secured good design.

Response:

Wording of Policy intended to make its purpose clearly understandable. Policy seeks to ensure applicants can demonstrate they have pursued and secured good design. Draft Plan Policy ENV3 will be included in Area Local Plans.

Action:

Draft Plan Policy ENV3 will be included in Area Local Plans.

Comment No: 56

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Density

Comment:

With regard to Draft Plan Policy H8, most of this would seem to belong to the other housing policies in Chapter 3. The point about layouts probably belongs with design not density.

Response:

Comments noted. The order and layout has been reviewed in finalising the Structure Plan.

Action:

Draft Plan Policy H8 now Finalised Plan Policy H6.

Comment No: 57

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Countryside Access

Comment:

There is very little in Policy ENV8 on recreation facilities and open space in general, except for paras 4.33 and 5.7. Whilst accepting that policy guidance should be in Local Plans, perhaps the Structure Plan should indicate the importance of considering the quality, quantity and accessibility of open space provision and accordingly the need to protect and safeguard areas of open space perhaps by expanding para 5.7.

Response:

Considered that Policy ENV8 (now ENV6 in the Finalised Structure Plan) does indicate the importance placed on access to the countryside. Open space is an issue which is also dealt with in the Local Plans.

Action:

Policy ENV8 of the Consultative Draft Plan is now Finalised Plan Policy ENV6.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Key Diagram

Comment:

With regard to the Key Diagram, the coastal breakdown of developed/undeveloped land is acceptable but should be reflected in the Key Diagram and not left entirely to the Local Plan.

Response:

The issue of planning for the coast is dealt with in Local Plans. Flooding issues were fully considered as part of the exercise of drawing up the strategy.

Action:

No Change

Comment No: 59

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

The Plan makes only briefest mention of flood issues. SPP1 says that "areas at risk from flooding" is an issue to which the Council will have regard in identifying sites in Local Plans and assessing other development proposals. The Structure Plan however should be clearer on the nature of the flood risk in Fife, including on the coast, and apply as appropriate SPP7, notably paras 39-41. In particular it should apply para 39 which says "The Structure Plan settlement strategy must take account of the potential risks from flooding. For coastal and watercourse flooding the proposals and policies should be based on the Risk Framework".

Response:

Flooding issues are addressed in the Area Local Plans. Currently awaiting SEPA flood maps for 1:200 year return flood areas which will inform site selection process in preparing Local Plans and development control decision making.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

The Glossary entry on Green Belt does not fully reflect the purposes of Green Belts. We suggest a replacement along the following lines: "Green Belt: areas of land where strict control over development applies to help maintain identity and landscape setting of towns and provide countryside for recreation or institutional purposes, as set out in Scottish Department Circular 24/1985."

Response:

The glossary is a general guide and is not a source of legal definitions. The Scottish Executive has recently issued a Scottish Planning Policy (SPP) note on Green Belts which updates Circular 24/1985. This has been taken into account in finalising both the Structure Plan and the St Andrews and East Fife Local Plan.

Action:

ID 0499

Scottish Enterprise Fife, Johnston, Willie - Glenrothes

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The draft clearly places the Fife economy as a key driver of the strategy. This is welcomed.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Noted that the overall strategy, policies and proposals are supportive of Scottish Enterprise Fife's strategic projects including St Andrew World Class, Rosyth Waterfront and the Energy Park at Methil.

Response:

Support noted.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Following the National Planning Framework guidance, the draft places Fife within an East of Scotland context. There is though an opportunity to more clearly emphasise the importance of Fife's transport links, and in particular the Queensferry crossings, within the wider context of the East of Scotland. The commuter and market access to Edinburgh City Region and Edinburgh Airport are also significant for the Dundee and Aberdeen City Regions and parts of the Highlands.

Response:

Agreed. Suggested as a forward sentence in paragraph 1.17 "Whilst the major routes provide local links to the adjacent cities they are also part of the wider Scottish transportation routes to the cities of Perth, Inverness and Aberdeen and much of Scotland" north of the Central Belt.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The role of the cities are mentioned, but the draft does not emphasise the importance of the City Regions in driving the strategy. Following the cities Review and the refreshed Smart Successful Scotland, Scotland's cities have been identified as the key drivers of the national economy. The draft makes little reference to Fife's adjoining city regions and the influence they have over the Fife economy. There is an opportunity to clearly acknowledge their role and illustrate how their economic opportunities are being positively harnessed by the Plan.

Response:

Amendments to reflect this change in emphasis are addressed in the Finalised Structure Plan.

Action:

More emphasis has been placed on city regions in the Finalised Structure Plan.

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Supports the ambitious target to continue growing the Fife population and in particular addressing decline of Mid Fife's population. This will have a positive impact on the regeneration of the area.

Response:

Support noted.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The emphasis on providing more affordable housing in pressured areas is supported - particularly in the St Andrews housing market area.

Response:

Support noted.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The housing and employment land allocations have been principally spread across the six Strategic Development Areas. Whilst Scottish Enterprise Fife is generally supportive of the Strategic Development Areas, it is their view that a concentration of allocations along the A92 corridor (between Kirkcaldy and Glenrothes) would allow a significant growth pole to develop in Mid Fife. This would complement the current growth poles in St Andrews and the Bridgehead area. Currently the allocations in Mid Fife are spread thinly across the five strategic development areas, but concentrating development would have a number of advantages including economies of scale and the potential to provide shared facilities for Mid Fife complementary to the existing towns. To deliver the necessary scale of concentration the allocations in other Mid Fife locations could be scaled back.

Response:

Greater concentration of growth has been given further consideration in finalising the Plan and the allocation for Kirkcaldy East increased.

Action:

The SDA to Kirkcaldy East has been increased to 2,500 new houses to concentrate growth more.

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

With regard to para 2.5 consideration should be given to increasing the supply of general industrial land within the Strategic Development Areas.

Response:

There is sufficient flexibility in the system to allow land requirement identified in Proposal PE1 to provide for general industrial land should the need arise.

Action:

No Change

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

With regard to para 2.7 it is the view of Scottish Enterprise Fife that there is also short and medium term demand for employment land in St Andrews.

Response:

Proposal PE1 identifies the need for employment land in St Andrews to be allocated via the Area Local Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

With regards to para 3.10 it is suggested the words 'the uncertainty of 'should be deleted from the first sentence.

Response:

Disagree. In reality market needs do fluctuate.

Action:

No Change

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

With regards to para 3.16 tourism is also very important to other parts of Fife. This should be acknowledged.

Response:

Agree that tourism is important to the whole of Fife. Wording in supporting text has been amended to emphasise this.

Action:

Amend text.

Comment No: 12

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

With regards to para 3.20 the vision for the Energy Park is wider than just the renewables sector. It could also be utilised by the wider energy sector or manufacturing companies needing sea access.

Response:

The main thrust of this proposal is directed towards renewables. However, this does not preclude scope for other users in the area as suggested.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

With regards to Proposal PE1 it is suggested that the reference to Methil Waterfront be changed from renewable energy manufacturing to energy/manufacturing.

Response:

The focus of this reference is on manufacturing for the renewable energy sector. The identification of this preferred use in Proposal PE1 does not rule out other manufacturing interests in developing in the area.

Action:

No Change

Comment No: 14

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

The potential for the Kingslaw site as a site for transport interchange should also be included.

Response:

It is likely to be included in the Local Transport Strategy as a long term proposal and would be progressed via the Area Local Plan and design briefs.

Action:

No Change

Comment No: 15

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Scottish Enterprise Fife strongly supports Draft Plan Policy H5 and in particular the ambitious target for the St Andrews area. The limited availability of affordable housing has been consistently identified by businesses as a major constraint on growth in the St Andrews area.

Response:

Support noted, however, the percentage target has been reduced to ensure consistency with PAN 74. Draft Plan Policy H5 now Finalised Plan Policy H4.

Action:

Revise Finalised Plan Policy H4.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

With regard to para 6.4 it should be made clear that the Central Fife Action Plan will be completed in 2006. In addition the framework for economic development and Smart Successful Scotland should be added to the list of other plans and strategies mentioned in para 6.4.

Response:

Agree.

Action:

Amend Finalised Plan to include Smart Successful Scotland at Para 5.4.

Comment No: 17

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Key Diagram

Comment:

The A92 corridor hatching should be extended further north along the A92.

Response:

The Key Diagram is not intended to provide an exact geographical location for development proposals.

Action:

ID 0500

Dundee City Council,

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Whilst the longer time period for the draft Fife Structure Plan reflects current Scottish Executive advice regarding strategic planning, this approach is not appropriate in the context of the proposed introduction of City Region planning. For the proposed City Region plans for Edinburgh and Dundee to be effective, it is vitally important that long-term strategic planning for the whole area is considered and established through this process. The current approach by Fife Council seeks to deny this by establishing a long term development strategy for Fife, undermining the ability of the proposed strategic development plan authorities to consider and progress their city region plans.

Response:

Disagree. The Plan sets out an appropriate long term strategy to 2026 and beyond where development areas are known to have greater capacity.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The identification of significant areas for new housing close to Dundee would seem to represent a shift in the strategic planning approach inform the current Fife Structure Plan, where it is a stated policy objective to constrain migration led housing development. The development of a significant number of houses within and close to the greater Dundee housing market area has the clear potential to attract households from Dundee. This will undermine the development strategy of the Dundee and Angus Structure Plan seeks to halt and reverse the trends of Population decline. The promotion of significant housing development without associated economic development without associated economic development will also lead to increased commuting, putting further pressure on the Tay Road Bridge.

Response:

Strategic housing allocations are now set out in Finalised Plan Proposal H2.

Action:

A range of changes have been made in finalising the strategic housing allocations as set out in the Finalised Plan at Proposal H2.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Proposals in the Draft Plan relevant to Dundee City Council are the proposed new rail station at Wormit and a Park and Ride facility at Tay Bridgehead. These proposals seek to encourage more sustainable transport. However, it is noted that whilst a new rail station at Wormit was considered, it was not supported by the Tay Estuary Rail Study. The viability of this proposal is therefore questioned.

Response:

Support noted. Proposals for a new rail station at Wormit will be pursued through the Local Transport Strategy and Area Transport Plan.

Action:

ID 0501

Perth & Kinross Council, Bean, Roland - Perth

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Draft Structure Plan's support for a new multi-modal crossing of the Forth and for a new Kincardine Bridge that are welcomed in principle as they are important to safeguarding and improving the accessibility and Perth and Kinross within the wider transport network.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

It is difficult to see how the over allocation suggested for North East Fife and for Newburgh in particular would not distort the geography of opportunity for house buyers would otherwise reasonably be expected to gravitate towards Perth and other areas. Particularly given the uncertainty as to associated employment provision, the high levels of out-commuting to Perth normally expected from such a development would seem unsustainable.

Response:

A number of changes have been made to the strategic housing allocations as set out in the Finalised Plan at Proposal H2. Newburgh no longer a strategic land allocation area.

Action:

A number of changes have been made to the strategic housing allocations as set out in the Finalised Plan at Proposal H2.

ID 0502

The City of Edinburgh Council, Hall, Stephen - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Setting a long-term strategic vision for development is good practice to ensure that planning guides investment, rather than reacts to it. However, the length of the plan period does seem excessive given the expectation that City Region planning will be introduced in the forthcoming planning bill. The Scottish Executive's April 2004 consultation paper "Making Development Plans Deliver" indicate that Fife Council will be likely to be required to join with the Edinburgh, the other Lothian authorities and the Scottish Borders Council to produce a single strategic plan for the Edinburgh City Region, in the medium term. The 2001 census travel to work area information confirms that the Edinburgh city region extends into parts of South Fife. It is important that the options available to this City Region planning exercise are not unnecessarily limited by the long-term strategic direction of the constituent authorities having already been set. A reference to Local Plan housing allocation post 2011 being subject to review is welcome. But nevertheless there is a risk that the long term growth expectations created by the draft plan would prejudice future City Region planning.

PAN 37 states that Structure Plans should run at "at least ten years from approval". SPP3 refers to identifying land requirements 12 years and providing broad indication thereafter. It is therefore suggested that Fife considers planning for an earlier end date such as 2018. Failing this, it would be essential that the plan contained a clear statement that the housing and industrial land requirements identified in the plan will themselves be the subject of periodic review and reevaluation through any statutory city region planning exercise. Local plans should not allow for the development of sites to meet medium to long-term requirements, or require that infrastructure be committed, until such a review or re-evaluation has taken place.

Response:

The Plan sets out an appropriate long-term strategy to 2026 and beyond where development areas are known to have greater capacity.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Fife's aspiration to expand its population beyond forecast levels is acknowledged, as is the potential of development in South Fife to meet some of Edinburgh's housing needs. It is, however, important that Fife Council establishes that these growth targets are realistic, specially given the back drop of overall forecasts of population decline across Scotland. It is also important that real development need (in Edinburgh or elsewhere) are not compromised by national infrastructure spending (specially transport and drainage monies) being diverted to proposals elsewhere in Scotland that may not materialise. Fife is therefore requested to include a fuller analysis of the plan's growth expectations in the finalised document.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Councils such as West Lothian, East Lothian and Stirling are all projected by the GRO (General Register Office for Scotland) to have population growth over 9% in the period up to 2018.

Fife is now coming under the influence of the Edinburgh City Region. Between 2000 and 2004 the population of Fife has grown by over 6,000. This level of growth easily meets the 5% aspirational population target set for Fife over a twenty year period. Recently published 2004 based population projections show Fife growing by 9.1% over the next twenty years.

Action:

Demographics work has been updated, the details of which are contained in the Report of Survey.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Given that South Fife is part of the Edinburgh travel-to-work area and Edinburgh housing market area, there is a key issue as to how far Fife should plan to meet part of Edinburgh's housing needs. Significant levels of growth in certain parts of Fife could lead to increasing long distance commuting to Edinburgh, which may be inconsistent and unsustainable development objectors. It is difficult, on the basis of Fife Matters to make assumptions as to how much of Edinburgh / Lothians housing requirement Fife is expecting to take. This could create difficulties when the Lothian authorities come to prepare their proposals for the review for Edinburgh and Lothian Structure Plan. Fife Council is therefore requested to enter discussion with the Lothians authorities, prior to the finalisation of the plan, to quantify the extent to which household growth in Fife will relieve housing pressures south of the Forth, while meeting the city's objectives for sustainable development and communities. It is particularly important to clarify that population growth must take place in tandem with the economic growth to ensure that development is sustainable and does not give rise to long distance commuting.

Response:

The Finalised Structure Plan's strategy acknowledges an increase in people commuting from Fife but seeks to ensure that they are provided with adequate public transport service as an alternative to the car. It is intended to pursue a policy that seeks to provide those who move to Fife a wide range of employment opportunities. Fife Council has entered discussion with fellow Edinburgh area City Region Authorities.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The proposed expansions of Dunfermline and Inverkeithing are likely to put significant and additional pressure on the Forth Road Bridge. It is considered that discussions will need to focus on this issue and whether such ambitious allocations are desirable in this context.

Response:

The Finalised Structure Plan clearly sets out the requirements for new transport infrastructure in order to secure its implementation. The allocations are likely to be reviewed, albeit as part of a City Region Plan, in the future.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

There is significant pressure on the Cross-Forth travel, especially at peak periods when the existing road bridge already operates at capacity. Major joint study, the SESTRAN Integrated Transport Corridor Study (Queensferry Cross-Forth Corridor), has recently been examining options for the future of cross Forth travel. This is concluding that "the clearly defined target of the long-term recommendation is to facilitate future increases in Cross-Forth people movements that support the development of the local economy, whilst ensuring that demand for travel is controlled sufficiently so that road traffic to-from Edinburgh rises no faster than the underlying rate of growth (i.e. without a new bridge). Whilst such an outcome might make a new bridge acceptable in terms of its impacts on Edinburgh, it is as yet unclear how, or whether, it can be achieved in these terms.

Response:

Comments noted. The Finalised Structure Plan supports the provision of a new multi-modal crossing and associated approach networks at Queensferry, to serve Eastern Scotland and to assist in growing Fife's economy. Further studies are ongoing to assess future options and the Structure Plan outlines Fife Council's position in relation to support for an additional crossing.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

The proposed ferry service, which potentially offers an additional more sustainable transport option for commuters to Edinburgh, is supported. It has particular value as a link to North Edinburgh, which is less well served by current public transport options from Fife. There is good potential for integration with Edinburgh proposal tram-line one.

Response:

Support noted.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

The draft Plan offers support for the Edinburgh Airport rail link and for capacity improvements at Waverley and Haymarket Stations, and these statements of support are welcomed.

Response:

Support noted.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

City of Edinburgh Council recognises the important existing and potential role of Rosyth as a transport hub for East Central Scotland. In particular, such a hub would directly improve access to European markets for businesses in Edinburgh, and would be likely to increase international tourism to the East of Scotland, much of which would no doubt be shared by Edinburgh. It is also feasible particularly given the deep water capacity of the Port of Rosyth, that significant investment would enable further diversion of freight traffic from the Port of Leith. This could have implications for the pace of the proposed redevelopment at Leith Docks. These references in the draft Plan are therefore supported.

Response:

Support noted.

Action:

No Change

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

The relocation of manufacturing businesses out of Edinburgh in recent years has been influenced by market forces beyond the scope of the planning system. This process may now be largely complete; however it has been facilitated by the availability of land in Fife and elsewhere. The desire to increase Fife's manufacturing base is accepted, and so there is therefore no objection to the identification of large areas of new industrial land in Fife. Proposals to grow Fife's knowledge economy are supported as being likely to complement the existing knowledge base in Edinburgh and contribute to the development of an East of Scotland cluster of international renown.

Response:

Support noted. Allocation is for employment land - much of this will be for service employment, not just manufacturing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

As Fife has no regional shopping centres, the direction of some higher order retail spending from Fife to Edinburgh and Dundee is a normal part of the retail hierarchy, which helps maintain these cities' regional retail role. However, it is acknowledged that Fife wishes to retain more expenditure to improve the vitality and viability of its town centres, and to reduce travel demand. There are therefore no objections to this approach.

Response:

Noted.

Action:

ID 0503

Clackmannanshire Council, Urguhart, Niall - Alloa

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The general strategy to seek to arrest population decline in Mid Fife and ensure that the very marginal levels of population growth envisaged for Fife generally do not lead to social and economic stagnation is acknowledged and supported.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The scale of development in West Fife and in particular in Dunfermline, Inverkeithing and Kincardine will inevitably result in significant increase in commuting and may, to a limited extent, have an influence on neighbouring Housing Market Areas including that in Clackmannanshire, by capturing mobile demand from South of the Forth that might otherwise have been attracted to Clackmannanshire, particularly following the opening of the new Upper Forth Crossing. The intention to allow over allocation on brownfield sites within West Fife is of concern as this will be additional to the already large scale of development proposed for West Fife in the Plan and partly driven by demand from adjacent areas. At this stage, it is unclear what the scale of this additional brownfield development is likely to be or where it would be located. However, this may have potential implications for future housing demand in the East of Clackmannanshire and Clackmannanshire Council is concerned that this approach has potential implications for its own housing market. Further information is required from Fife Council before any decision is made on whether to support the approach in the Finalised Plan.

Response:

Brownfield opportunities are set out in the Urban Capacity Study. Further discussions are ongoing with Clackmannanshire Council.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The plan's strategy for business development and employment is supported, although there are concerns regarding access to the Port of Rosyth. The provision of 80 hectares of new business land at the Dunfermline Strategic Development Area and the continued commitment to 200 hectares of land at the Rosyth waterfront is welcomed although transport links between these facilities remain a concern. In addition the continued proposal for a business park at Kincardine, which has the potential to provide local employment and reduce the need for commuting, is welcomed.

Response:

Support and concerns noted.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

The growth of Dunfermline that is envisaged together with proposals for the new multi-modal Forth Bridge and the completion of the Rosyth Bypass will considerably increase pressure on the two existing main road routes between Clackmannanshire and the Dunfermline area with potential penalties in terms of accessing the M90 Forth Bridge and the Port of Rosyth for Clackmannanshire residents and businesses unless transport infrastructure is improved. Whilst the support for the reintroduction of passenger rail services between Alloa and Dunfermline is welcomed, the Plan has nothing to say on the likely impacts of the proposed major development on the A985 or the A907. It is considered that increased congestion on the A985 in particular could result in economic costs for Clackmannanshire and further information is therefore required and the likely level of traffic generation on that route.

Response:

The Finalised Structure Plan identifies the key strategic transport proposals for Fife for 2006-2026, including potential for an additional multi-modal crossing of the Forth. The Report of Survey details the thorough research and transport modelling undertaken in support of the Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

The plan strategy for public transport provision in the Dunfermline Strategic Development Area is unclear. Whilst there would be clear benefits for Fife if passenger rail services were to be reintroduced between Alloa, Dunfermline and Edinburgh and the expansion of Dunfermline to the West may assist in the economic justification for such a service and provide high quality public transport for the development in the area (providing a direct rail link to Glasgow, Stirling, Alloa, Edinburgh and other Fife destinations). However the plan does not link its support for the reopening of the line to the strategic development area and places greater emphasis on provision of a tram link via a new Forth Bridge to Edinburgh. No explanation was given as to how this would be funded (beyond scope for developer contributions) and no comparison of the economic case of using existing infrastructure against creating a new light rail route from Dunfermline to Edinburgh via a new bridge is given. This is considered to be a major omission and improved justification of the approach proposed that's needed. It is considered that Clackmannanshire would not benefit from the tram proposal and it could undermine the case for reopening the Alloa to Dunfermline rail line to passenger services in the future.

Response:

Public transport provision in the Dunfermline Strategic Development Area will be progressed via the Dunfermline and West Fife Local Plan, masterplanning and the Area Transport Plan, through which Fife Council will maintain its support for the expansion of rail services. Further information on key transport infrastructure proposals is contained within the Action Plan, which will be updated biennially.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Future development of the Port of Rosyth is of considerable economic importance to Scotland as a whole. Clackmannanshire's proximity to the port means that it is well placed to benefit from the development of commercial opportunities which Fife Council is encouraging. The Structure Plan's strategy to encourage development, including the multi-modal freight hub and improved transport links to the port would benefit Clackmannanshire and are therefore welcomed. However, access to the port from the west is poor and the plan does not address this problem. The intention to improve road access between the port area and the M90 will improve access from the East but the plan fails to address the current inadequate access Westwards towards the A985 which is essential to reduce flows through Rosyth and allow improved ease of access towards the West. The planned support for a future rail link into the port, which would allow through rail traffic from Clackmannanshire in future, is welcomed.

Response:

Support welcomed and comments noted. The Finalised Structure Plan Action Plan, Schedule 3, details support for a Rosyth Bypass, with further information contained in the Local Transport Strategy.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The proposal for 550 additional houses at Kincardine, combined with the proposed development at Dunfermline have the potential to further add to traffic congestion at Kincardine in advance of the construction of an Upper Forth crossing. Clackmannanshire is strongly dependant on the existing bridge for access to the Central Scotland motorway network and major proposed development at Dunfermline and Kincardine should be placed in such a way that no additional traffic which would cause congestion at the Kincardine Bridge is created.

Response:

Concerns noted. This matter is more properly addressed by the Dunfermline and West Fife Local Plan. Kincardine is not identified as a location for strategic housing development in the Finalised Structure Plan. Transport requirements will be considered in detail in masterplanning the Dunfermline Strategic Development Area.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

The proposal for a new bus station interchange at Kincardine will be beneficial for those travelling to and from Clackmannanshire and is welcomed. The plan strategy is, to a considerable extent, dependant on the provision of additional Cross Forth road capacity in the form of a new multimodal bridge. There are difficulties in assuming that such a bridge will be provided during the term of the Structure Plan since there is, at present, no capital commitment to its provision. Further more, recent concerns expressed by FETA and Fife Council, over the likely life of the existing Forth Road Bridge due to accelerated deterioration, increases uncertainty over what likely road capacity will be available to accommodate the substantial growth proposed in West Fife. It is of considerable concern to Clackmannanshire that the scale of development in Fife, which is driven in part by a wish to contribute to the needs of the Lothian housing market, does not result in increased traffic generation via the Kincardine Bridge, particularly when congestion or closures occur on the existing Forth Road Bridge.

Response:

Noted. The Finalised Structure Plan supports the provision of an additional multi-modal Forth crossing at Queensferry as a key strategic transport proposal for Fife and for eastern Scotland. Studies are ongoing through the Scottish Executive and Regional Transport Partnership to evaluate options and the Finalised Structure Plan must reflect this position. The housing land requirement and proposed strategic development allocations seek to meet housing needs and support economic development in Fife over the next 20 years, giving full consideration to the potential traffic impacts. The Report of Survey describes the transport modelling work carried out in support of the strategy.

Action:

No Change

Comment No: 09

Document: Fife Structure Plan 2006 - 2026 Consultative Draft - Sustainability Appraisal

Subject: Document

Comment:

Disappointed that the Sustainability Appraisal does not meet the objectives and requirements of the Environmental Assessment of Plans and Programmes (Scotland) Regulations 2004.

Response:

The Sustainability Appraisal of the draft and finalised Plans are considered to reflect best practice. The Appraisal of the draft Plan did not require to meet legislative requirements at that time. A Strategic Environmental Assessment of the Finalised Plan will be submitted to the Scottish Ministers.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

The report should include a full analysis of the short, medium, long-term, permanent and temporary effects of each policy alternative and explanation of the alternatives considered and how these were analysed. Greater explanation is needed of the comparative ranges of environmental benefits or disbenefits.

Response:

Comments noted. The methodology used is considered appropriate. A full evaluation of sites has been undertaken and will be published with the Finalised Plan.

Action:

No Change

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

SEA templates are likely to be issued in time to give an opportunity to consider how the SEA might be expanded for the Finalised Plan. Recognises that under the EU Directive and Scottish Regulations, the full requirements of the SEA Regulations must be met only if the Plan has not been approved by 21st July 2006.

Response:

Fife Council is very clear on the new legislative requirements and has built on good/best practice of previous appraisals. The Sustainability Appraisal and Strategic Environmental Assessment of the Finalised Plan do meet legislative requirements.

Action:

ID 0504

SEERAD, Marshall, Lynda - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

SEERAD has no comments to make on the draft Structure Plan.

Response:

Noted.

Action:

ID 0505

Markinch Community Council, Morton, John - Markinch, Glenrothes

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Markinch

Comment:

Development of 200–400 houses in Markinch generally acceptable, with provisos on location and concomitant amenities but new development must not jeopardise the heritage and character of Markinch.

Response:

Noted. The Strategy of the Finalised Structure Plan includes the commitment to improving the range and quality of development and to securing sustainable communities.

The Finalised Structure Plan allocates 400 units at Markinch over the next 20 years. The emerging Kirkcaldy and Mid Fife Local Plan will identify the specific sites to meet the first 10 years of this need, and will be the subject of a future consultation exercise.

Action:

400 new houses are proposed at Markinch over the next 20 years.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Markinch

Comment:

Concerned about further development on Balbirnie Park and other locations within Markinch and its potential to impact on the existing road network. The preferred greenfield location for future development is the area to the east of the railway in the Dalginch/Brunton area. This, however, should be viewed as the "least bad" option and that it may not have universal support of Markinch residents.

Response:

Noted. As mentioned above the emerging Kirkcaldy and Mid Fife Local Plan is the vehicle for addressing detailed land allocation issues.

Action:

No change

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Markinch

Comment:

Any further development should be supported by amenities concomitant with the size of the expanded settlement.

Response:

The Finalised Structure Plan seeks to ensure that the provision of infrastructure, including an appropriate road network, and the provision of an appropriate level of services and amenities for new developments will be fully addressed.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Markinch

Comment:

The Dalginch area has known historic importance and no building work should be permitted prior to archaeological investigation.

Response:

The Kirkcaldy and Mid Fife Local Plan will contain the appropriate archaeological policies. It is established practice to address archaeological issues prior to development being permitted.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Markinch

Comment:

Whilst Markinch is becoming a popular residential area there should also be local employment opportunities appropriate to the area, i.e. light industry.

Response:

Noted. Whilst the Finalised Structure Plan does not identify strategic scale employment land provision for the Markinch area, the Area Local Plan will seek to make provision for this use.

Action:

Kinghorn Community Council, McLeod, John - Kinghorn

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Affordable Housing – Who defines what is affordable housing – surely it should mean "social housing."

Response:

There is no simple, commonly agreed definition in use. The term is generally taken to mean more than just social rented housing. The definition used in the Finalised Structure Plan and Supplementary Guidance is consistent with SPP3 and PAN 74 and

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Brownfield Land

Comment:

In order to strike the balance between industry/business and housing – should not be allowing every piece of spare ground to be given over to housing which encourages commuting. Should be reserving ground for business especially in smaller communities where there is little or no effort to encourage business.

Response:

Noted. Land is allocated for employment purposes in the smaller settlements in the appropriate Local Plans and, where appropriate, new land will be allocated in the emerging Area Local Plans. Policy E1 addresses this concern further by ensuring a range of employment land throughout Fife. In the Development Plan led system land for housing should be identified for this purpose in Local Plans but there is provision for "windfall" sites not identified in Local Plans which meet Development Plan policy criteria. Fife Council works in conjunction with a number of partner agencies to encourage business formation and support existing businesses. Reference to "smaller employment sites" has been added to supporting text, to emphasise importance of employment sites in smaller communities.

Action:

Amend supporting text to Policy E1 to include reference to smaller employment sites.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

The definition of rural areas and urban areas depends on who makes it.

Response:

It is accepted that there has been a problem over the number of definitions of rural areas. The Scottish Executive has been working towards a single definition.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

In relation to transport and business Kinghorn appears to be classed as rural as in the transport corridor Kinghorn, Burntisland and Aberdour are missed out, especially on bus route development.

Response:

Noted. However, all three towns have railway stations and regular rail services provide links to Kirkcaldy and Dunfermline and beyond.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Ferry Toll is fine but it seems daft to travel there by car to then take a bus to Edinburgh.

Response.

The Ferry Toll Park and Ride provides the option for public transport for those not on the main fixed rail or express bus routes. It reduces traffic crossing the Forth Road Bridge which assists in reducing journey times and relieving congestion at peak periods. Finalised Plan Proposal PT1 (Draft Plan Proposal PT2) and the Local Transport Strategy include proposals for additional Park & Ride/Park & Choose sites to enable wider access to the public transport network.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Rural Economy

Comment:

Whilst Draft Plan Policy E3 supports Rural Businesses, in many instances it is difficult to sustain local business. Any spare land is given over to housing if there is no suitable ground.

Response:

Fife Council in conjunction with other Agencies does seek to assist new and expanding businesses to find suitable premises/land to develop on. Land is/will be reserved for identified local needs via the Local Plan process. Draft Plan Policy E3 will be incorporated into Local Plans

Action:

Draft Plan Policy E3 will be incorporated into Local Plans.

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Brownfield Land

Comment:

Despite Draft Plan Policy ENV2, many brownfield sites are given over to housing which denies local businesses the opportunity as Fife Council has directed them to vacant units outside the local area.

Response:

Local Plans will allocate appropriate brownfield sites for employment land. Supporting text to Policy E1 now reflects to smaller employment sites. Draft Plan Policy ENV2 has been renamed BL1 in Finalised Structure Plan.

Action:

Amend supporting text to Policy E1 to include reference to smaller employment sites. Draft Plan Policy ENV2 has been renamed BL1 in Finalised Structure Plan.

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Natural Environment

Comment:

In relation to Policy ENV5 of Draft Plan, concerned that the development of brownfield sites, bordering on nature areas, are used for housing and could have an adverse effect on them.

Response:

Individuals, organisations, and businesses have the opportunity to comment on proposals for brownfield sites when Local Plans are formulated and to comment on individual planning applications. Full account will be taken of all Development Plan Nature Conservation policies. Policy ENV5 of Draft Plan now Policy ENV3 of Finalised Plan.

Action:

Fife Constabulary, Mellor, David - Glenrothes

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Design Quality

Comment:

Consider that ample evidence exists of substantial community benefits by implementing principles of Crime Prevention through Environmental Design (CPTED). Consider appropriate references should be added to page 6 paras 1.22 & 1.23 and page 24 para 3.28. This would strengthen the Plan.

Response:

Issue not ignored in Fife Development Plan. It is considered that Area Local Plans, Master Plans and Design Briefs are the most appropriate vehicles for implementing CPTED and that CPTED is included as an item in the Fife Urban Design Guide. (Para 3.28 merely deals with housing whereas para 4.33 deals with all forms of development).

Action:

Consider revising para 1.22 sentence 5 to read "Raising the quality of housing and ensuring it is secure by design will have health and social benefits". Draft Plan Policy ENV3 will be reviewed and included in Area Local Plans.

Dalgleish Associates Ltd, Per Enstone Thistle Ltd, Dalgleish, Karen - Dunblane

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Aggregates

Comment:

Legislation requires aggregate producers to pay the Aggregates Levy of £1.60 per tonne. Coal producers not subject to this levy and Aggregates Levy far exceeds royalties paid to trust funds by the opencast industry. The Aggregates Levy has benefited Fife since year 2002–2003.

Response:

There is no local control over the Aggregates Levy Fund expenditure and there are restrictions on the areas that may benefit.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Minerals

Comment:

Where proposals are environmentally acceptable there should be no requirement to provide additional funding. Para 4.13 and Policy M2 should be amended to acknowledge aggregates levy.

Response:

Disagree. Aggregates Levy funds can only be used in close proximity to extraction sites. It is considered that the benefits should be extended to those who may be remote from the mineral operations yet are affected, for example, by an increase in heavy vehicle traffic.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Aggregates

Comment:

Para 4.13 and Policy M2 should be amended to acknowledge the presence of the Aggregates Levy and the benefits derived thereof.

Response:

There is scope to mention the Aggregates Levy in Para 4.13. However, there is no need to amend Policy M2. The wording of Paragraph 4.13 and Policy M2 indicates that Fife Council wishes to enter into discussion with mineral operators about their contributing to the Fund. The Finalised Structure Plan makes it clear that there is no mandatory requirement for operators to make contributions to the Fife Minerals Trust Fund. The Finalised Structure Plan also makes it clear that any contribution would be agreed with each operator and take account of site-specific circumstances.

Action:

Atisreal, Pearson, Euan - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

Suggests that Policy SDA1 be altered to exclude retail from the mix of uses to be masterplanned except for neighbourhood centres selling convenience goods as defined in NPPG8.

Response:

This policy refers to the seven specifically named Strategic Development Areas. The issue of the provision of retail floorspace for these areas is best addressed via the masterplanning process, as this will ensure that it provides for local needs. Retail uses are not proposed for the employment land areas.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

Supports Fife Matters policy of directing major non-food retail to Kirkcaldy town centre. However also supports the provision of new food retail as both must be provided if the stated objective of growing the town centre to regional centre (NPPG8 in excess of 50,000m2 floorspace) is to be achieved.

Response:

Support for policy noted. The Finalised Structure Plan does indicate growth in food expenditure to 2016 but does acknowledge that additional provision may be required in areas proposed for significant residential growth. Consider that policies provide support for retailing but in a planned sustainable way. Proposal would be considered on its merits as per Policies S2 and S3 at the time of application.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

Whilst Fife Matters suggests that Local Plans should assess the potential to release land in non-town centre locations for retail it should make it clear that it is not appropriate in the case of Kirkcaldy.

Response:

It is not possible to rigidly apply such a restriction in entirety and satisfy the sequential approach as set out in NPPG8. Agree however that it is important to support Kirkcaldy town centre but consider policies of Finalised Structure Plan will do this.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

Concerned that Policy S2 is too flexible and would allow uncoordinated supermarket construction which may lead to impacts on town centres. Thresholds need to be changed.

Response:

Disagree. All retail proposals must be considered against Policy S2 and other relevant policies. The thresholds expressed in Policy S2 apply to the requirement for retail impact assessments (RIA) to be submitted with a planning application. Where it is considered necessary applicants for smaller scale proposals may also be requested to supply an RIA. Policy should also be read in conjunction with Policies S1 and S3 which clearly support town centres.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

Suggests rewording of Policy S2 to direct major retail development over 1,000 m2 to Dunfermline, Kirkcaldy and Glenrothes in the first instance and to require an RIA for developments over 500 m2 gross floorspace elsewhere.

Response:

Such an approach would be overly restrictive, especially in terms of smaller town centres.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Support Proposal PS1 and the intention to develop masterplan for Kirkcaldy town centre.

Response:

Support noted. Proposal has been reworded but still expresses support for Kirkcaldy Town Centre. Other wording has been subsumed into Policy S3.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Suggest supplementary Policy which requires Local Plans to make provision for and promote masterplans for Fife strategic town centres (Dunfermline, Kirkcaldy and Glenrothes) and stating that proposals for new retail and commercial leisure and other town centre uses will be supported where they accord to these masterplans.

Response:

Do not consider additional policy is necessary. Masterplans would be a material consideration rather determining planning applications but proposals must accord with Development Plan (unless a departure can be justified).

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

Does not agree with Fife Council's view as expressed in Policy S3 that need for new retail floorspace in Kirkcaldy has been met. Wording should acknowledge that ongoing review is necessary.

Response:

Last paragraph of Policy S3 has been deleted. Policy approach will be informed by planning research to ensure it remains up-to-date.

Action:

Delete last paragraph of Policy S3

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

Suggests Policy be amended to take account of Fife Retail Capacity Study (2002).

Response:

The 2002 study is now being replaced by the 2006 Fife Retail Capacity Study.

Action:

Reflect latest study in the Finalised Structure Plan

Fife RIGS Group, Browne, Mike - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Natural Environment

Comment:

Considers it is of key importance to include geodiversity and biodiversity issues in the Development Plan. Also considers it would be useful to establish supplementary planning guidance for nature conservation in the planning and development process for geodiversity as well as biodiversity essentially along the lines of those already in existence for archaeology.

Response:

Noted. Fife's Development Plan does include policies on nature conservation of dealing with sites ranging from international to local significance. The production of supplementary planning guidance is not a strategic planning matter and should be considered in the context of Local Plans.

Action:

Kirkcaldy Civic Society, Hall, Mary - Kirkcaldy

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Kirkcaldy West

Comment:

Concerned that Draft Plan fails to allocate strategic employment land in the western part of Kirkcaldy.

Response:

Comments are noted. See Proposal PE1.

In view of the existing supply of undeveloped employment land in the Kirkcaldy area together with that identified in the Finalised Structure Plan, there is no need to allocate any additional employment land until towards the end of the life of 20 year period. Paragraph 2.4 of the Finalised Structure Plan indicates that the development of employment land to the north-west of Kirkcaldy should take place in the longer term and specific reference is made to land adjacent to the A92 to be protected for development beyond 2026.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Kirkcaldy West

Comment:

Concerned traffic likely to be generated by new development.

Response:

As well as encouraging development in locations that increase accessibility to homes, employment and services, the Local Planning and Masterplanning process would guide development away from locations where traffic generated by the development would not adversely impact on local communities. Traffic issues would be addressed in order to ensure that any new development is properly serviced in order to prevent potential problems.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Kirkcaldy West

Comment:

Not sustainable for Plan to compel new residents to work outside their local area.

Response:

The Finalised Structure Plan is a strategic land use plan it does not compel anyone to do anything, as it can only work towards creating the land use and policy framework for positive change. The plan must provide land for housing and employment purposes to meet forecast requirements. Whilst the housing allocation makes provision for people coming to settle in the area, it also makes provision for local people. It is hoped that the larger pool of skilled able people and suitable employment sites will make Fife a more attractive place for employers and thereby reduce the need for commuting.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Public Transport

Comment:

Should be reference in Plan to the provision of additional public transport (bus) services.

Response:

The Structure Plan, is a strategic land use document and detailed transport service issues is outside its scope. Transport issues are better dealt with via the Fife Local Transport Strategy, together with the Area Transport Plans.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

Suggests the Plan would benefit from some tightening up of the arrangement and a reduction in the "repetition with variations."

Response:

The document has been edited, taking account of comments received.

Action:

South West Dunfermline Amenity Improvement Group, Neilson, Rona - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Why does Fife Council want to increase the population of Dunfermline?

Response:

The allocation is to meet forecast needs for the area over the period 2006-2026

Action:

Demographics work has been updated, the details of which are contained in the Report of Survey.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

As most of the people buying houses in the Dunfermline Eastern Expansion (DEX) work in Edinburgh, why doesn't Edinburgh increase the number of houses built there?

Response:

People from Edinburgh buying houses in Dunfermline are moving for lifestyle rather than housing needs reasons. Additional new housing in Edinburgh may not reduce demand for housing in DEX.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Why does Fife Council support building in Fife to protect the Edinburgh Green Belt?

Response:

It is considered that the strategy of developing housing in Fife to meet part of Edinburgh and the Lothians needs will provide Fife with a number of benefits.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

The Draft Plan indicates no further housing in Dunfermline until 2011. Can Fife Council confirm that the next Local Plan covering 2006-2011 will reflect this?

Response:

The shortfall is calculated on the basis of the housing land requirement less supply. Proposal H1 of the Finalised Structure Plan shows the requirement and shortfall by Housing Market Area. The Report of Survey provides further explanation of the calculations.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Will the proposed new bridge be constructed prior to the construction of new housing, and, if not how is it envisaged the existing road bridge will cope with increased levels of traffic generated by the population increases?

Response:

An additional Forth Crossing is not programmed at present and further studies are ongoing to explore options for addressing cross-Forth travel at Queensferry. As outlined in the Report of Survey, transport modelling in support of the Finalised Structure Plan highlighted the scale of single occupancy car commuting from Fife and the North, to Edinburgh and the Lothians, and the consequent problem of peak-time congestion across the Forth. The Finalised Structure Plan therefore seeks to reduce the amount of new housing at the Forth bridgehead and to avoid bringing this forward at the early stage of the Plan. The strategic land allocations were all focused in areas with high public transport accessibility or where new rail stations are proposed.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Where will the Green Belt for Dunfermline be located?

Response:

The boundary of the Dunfermline Green Belt will be delineated in the Draft Dunfermline and West Fife Local Plan, which will be the subject of public consultation before a finalised boundary is drawn.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

Currently the Queen Margaret hospital is being downgraded. How will the Health Board cope with increases in population?

Response:

The provision of health care facilities is an issue for NHS to determine. NHS Fife is aware of the proposals for growing Fife's population 2006-26.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Currently class sizes are high. How will schools in Dunfermline cope with the western expansion as the new schools for the eastern expansion have not been built?

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

No Change

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Who will regulate developers to ensure they provide affordable housing, community facilities, roads, public art etc.?

Response:

The Finalised Structure Plan sets strategic Policy approach. Detailed discussions will follow once the process has been advanced via Area Local Plans, Master Plans and development briefs. Details would be discussed during preparation of Area Local Plan, Master Plans and development briefs and via development control process when detailed proposals are being considered by Fife Council.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

How will Fife Council protect the history of the area e.g. approach to Dunfermline especially Pilgrims Pathway?

Response:

This will be achieved via the proposed designation of the Green Belt as per Policy ENV1.

Action:

No Change

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Water and Drainage

Comment:

What provision is being made to ensure there is adequate sewerage/water systems in place for western expansion considering the outstanding flood prevention plan for the Lynn Burn?

Response.

Policies DC1 and C1 seek to ensure that appropriate infrastructure is provided in support of development. The masterplans and development briefs for the Dunfermline Strategic Development Area will take full account of detailed flooding issues, implementing the guidance contained in SPP7.

Action:

No Change

Comment No: 12

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Leisure Facilities

Comment:

Why are there proposals to build on McKane Park when Scottish Executive are encouraging the increased profile and use of sports facilities.

Response:

McKane Park is allocated for Open Space in the Adopted Dunfermline and the Coast Local Plan. The Dunfermline Strategic Development Area option is to be pursued and the future of McKane Park and the area to the west will be considered during the preparation of the Dunfermline and West Fife Local Plan. The issue of recreational and open space requirements is important and will be fully addressed as part of the preparation of the Dunfermline and West Fife Local Plan. The Structure Plan is not site specific.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Leisure Facilities

Comment:

What is the possibility within the Structure Plan of upgrading and expanding local sports facilities instead of replacing them with housing?

Response:

The Structure Plan document does not address the upgrading of facilities it only addresses strategic planning issues. New sports facilities are considered in more detail through the Local Plan process.

Action:

Phimister, Donald G - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Increasing St Andrews housing stock and population will increase congestion in the town.

Response:

Concerns noted. The Area Local Plan and Area Transport Strategy address traffic issues in St Andrews. New development is subject to Structure Plan Policies T1 and T3 which guide new developments to locations that reduce the need to travel.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Expansion of St Andrews will exacerbate problems of insufficient car parking in the town.

Response:

Parking and traffic management are issues addressed by the Local Transport Strategy and Area Transport Plan. Further housing development in St Andrews as proposed in the Structure Plan and Area Local Plan, will be subject to masterplanning which will give full consideration to traffic generation and transport improvements

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Public Transport

Comment:

Buses, particularly any future shuttle link to and from Leuchars should enable luggage, golf clubs and large loads to be carried.

Response:

This is not a strategic planning issue. Comment passed to Transportation Service for information.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Built Environment

Comment:

The Plan should protect St Andrews' historic character.

Response:

Policy ENV1 identifies Green Belt for St Andrews to preserve the character, setting and views into and from the historic cores.

The Finalised Structure Plan Policy ENV1 will give the St Andrews Green Belt a positive role in the future development of St Andrews and gives clear guidance about what development will be considered appropriate.

Action:

Revise Policy ENV1

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Development to the West will create a bypass using Bogward Road. Not suitable as children use to access Canongate School. Development should include a proper bypass not use an existing residential area.

Response:

The future road network is an issue for the Local Transport Strategy and the Area Transport Plan to address.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

St Andrews Green Belt should be retained to allow no building, not merely restricting development

Response:

Within the boundaries of designated for the St Andrews Green Belt there will be strict controls over development.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

Need to protect the skyline of St Andrews from the west and the southern hillsides.

Response:

This will be achieved via the proposed designation of the Green Belt as per Policy ENV1.

Action:

Douglas, F - Wormit, Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Public Transport

Comment:

The Plan and the presentation at Newport-on-Tay, suggest a new rail halt at Wormit. However at the Public meeting, officers admitted this is not likely to happen. Why propose one then?

Response:

There has been a long-term commitment to a rail halt in Wormit. Preferred option many present problems but others may be capable of being implemented and the reference in the Finalised Plan Proposal PT1 addresses the principle of the provision.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - Tay Bridgehead

Comment:

Newport and Wormit roads cannot cope with existing traffic levels, due to inadequate parking facilities and road conditions. These issues need to be addressed before new housing is proposed.

Response:

The Tay Bridgehead (Tayport, Newport and Wormit) is identified in the Finalised Structure Plan as a Strategic Land Allocation for 500 new houses. The St Andrews and East Fife Local Plan will identify specific sites to meet this need. The allocation is a reduction from the Consultative Draft Structure Plan that identified 750-950 houses over the same period. This change has been made in response to the comments received on the draft Plan.

The detail of development proposals will be addressed through the Area Local Plan and development briefs, which will include full consideration of traffic issues.

Action:

Housing allocation reduced from 750-950 to 500 in the Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Public Transport

Comment:

Existing public transport is inadequate. The Tay bridgehead area needs a new rail halt.

Response:

Concerns about public transport noted. The Structure Plan promotes improvements to existing infrastructure and value appropriate new infrastructure in advance of development. Finalised Plan Proposal PT1 lists a new rail station at Wormit. Details would be addresses via local Transport Strategy.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

Plans showing housing proposals were clear but make no mention of GP Surgery or secondary school. Existing facilities are already inadequate and people have to travel to Newport or Tayport.

Response:

The Finalised Structure Plan needs to ensure that the necessary infrastructure and services are provided in advance of development. However, the detailed matters are addressed via the Area Local Plans.

Action:

Selwyn, F - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Concerned heart of St Andrews cannot cope with more vehicles and tinkering with roads will not help. Parking a problem. New housing will exacerbate problem.

Response:

Transportation issues are important. However, it is intended that the appropriate infrastructure and facilities will be put in place at an appropriate time to facilitate and support any development planned. This issue however is more appropriately addressed by the Local Transport Strategy and Area Transport Plan.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

The 1998 Strategic Study showed St Andrews at landscape capacity and no major expansion should take place. How has this changed? New development since 1998 has exacerbated traffic and aesthetic problems.

Response:

The 1998 Study for St Andrews was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Houses in Multiple Occupancy

Comment:

Market Street has 80% student occupation in Houses in Multiple Occupation. Students do not pay Council Tax leaving burden on residents.

Response:

Concern noted. It is acknowledged that this is an important local issue. However as the Structure Plan is a strategic document, this matter is more appropriately addressed by the Local Plan process, including the St Andrews and East Fife Local Plan. The issue of Council Tax is not a land use planning matter.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

How can Madras College cope with any more pupils? Where is the plan for a new school?

Response:

Fife Council is aware of the situation with regards to education and the appropriate Services have been liaising to identify the level of provision required to service any proposed new development. The Finalised Structure Plan identifies the needs for education in general terms in Proposal DC1 and this would be delivered, via developer contributions and other mechanisms, when necessary. Fife Council is currently undertaking an assessment of the provision of education facilities which is intended to improve the delivery of education services. This will take account of housing land allocations within the Development Plan. Details of the Shaping Future Schools for Fife exercise are available on www.fifedirect.org.uk or from Fife Council's Education Service.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Having agreed a proper Green Belt the latest "butterfly" belt is a mockery and will allow over-development to continue.

Response:

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries.

Action:

Policy and text amended.

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Concerns about cycle lanes.

Response:

Not a strategic planning issue. Comments copied to Transportation Services.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

Why should land that local businesses wish to develop be sold for more houses as at Bassaguard? Local businesses should be encouraged.

Response:

This issue is not strategic and being site specific it is more appropriately addressed by the St Andrews and East Fife Local Plan.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

Proposed hospital site in St Andrews is unacceptable. Should be at St Leonards or at the New Park site. Hospitals should be accessible on foot not generate traffic or spoil the landscape setting of the town.

Response:

The allocation of land for specific purposes is an issue for the Local Plan.

Action:

No Change

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

St Andrews always a World Class destination. Hypocritical to suggest it needs to be re-created. Improvements – yes; restyling – no.

Response:

Agree St Andrews World Class status. There is, however, scope to accept development and secure improvements, undertaken in a sensitive manner, which will improve experience for both local people and visitors alike.

Action:

Butler, Frank - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Significant additional housing would destroy qualities that attract visitors and prospective inhabitants alike.

Response:

Disagree. There is, scope to accept development undertaken in a sensitive manner, which will improve experience for both local people, visitors and prospective residents alike. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Before adding to problems should put infrastructure in place first and provide a new secondary school, adequate out of town parking, pedestrianisation of town centre.

Response:

Fife Council is aware of the situation with regards to education and the appropriate Services have been liaising to identify the level of provision required. Fife Council is currently undertaking an assessment of the provision of education facilities which is intended to improve the delivery of education services. Details of the Shaping Future Schools for Fife exercise are available on www.fifedirect.org.uk or from Fife Council Education Service. Transport issues are being address via the Local Transport Strategy and Area Transport Plans. (Finalised Plan Proposal PT1)

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Future expansion should be limited and preserve the St Andrews Green Belt.

Response:

There is currently no designated Green Belt. The proposed boundary is defined in the Draft St Andrews and East Fife Local Plan and this has been set to accommodate an acceptable level of new development.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

University of St Andrews should be encouraged to provide more accommodation for students thereby releasing housing for re-sale or public housing.

Response:

This is not a strategic planning issue. The St Andrews and East Fife Local Plan addresses the detailed issue of housing in St Andrews.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Concept for St Andrews is not acceptable and should be abandoned. Akin to turning beautiful countryside into industrial wasteland.

Response:

Employment does not necessarily equate to industrial estates. It is anticipated that employment generated would be linked to knowledge economy which can be accommodated in and around St Andrews.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Should preserve St Andrews as once destroyed it can not be re-instead.

Response:

It is intended that any development is planned thereby securing enhancements and positive change.

Action:

Scobie, David - Kirkcaldy

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

Welcomes proposal that Kirkcaldy should be preferred location for new shopping facilities.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

If quality retail outlets are to be attracted and retained the proliferation of "down-market" elements which contribute to anti-social behaviour must be controlled.

Response:

The Finalised Structure Plan makes it clear that Fife Council is seeking to improve the quality of its town centres including Kirkcaldy and Fife Council may decide to seek to use the Local Planning process to control the quality of retail establishments in specified areas. However, the planning system can only exert limited control over types of retailing especially if change of use fall within the same Use Class Order.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Kirkcaldy High Street and Whytescauseway have been allowed to decline to their present state and Fife Council seems to accept any planning application should be approved irrespective of its quality or suitability.

Response:

The Finalised Structure Plan is committed to raising the quality of Fife's town centres including Kirkcaldy and contains strategic objectives and policies to achieve this. Individual planning applications must be determined taking account of existing Development Plan (Structure and Local Plan) policies. However, Fife Council does not, as suggested, ignore quality or suitability factors. Any interested party with concerns about proposals which are the subject of planning applications can submit comments to Fife Council at the time when an application is being detained. In addition a new Urban Design Guide has been published by the Council.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Leisure Facilities

Comment:

Provide leisure facilities other than pubs, night clubs, fast food outlets and amusement arcades currently in town centre.

Response:

The allocation of land for specific civic facilities is identified via the Local Plan process. It is possible to steer the type of development mentioned to acceptable locations via the Local Plan process. Work has started on three new Local Plans and these are/ will be the subject of widespread public consultation.

Action:

Hopgood, J A - Blebo Craigs, Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

No definition of St Andrews World Class – appears to be an economic initiative.

Response:

St Andrews World Class is an economic initiative instigated by businesses in St Andrews and it is intended it will be come a company limited by guarantee.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Key Diagram

Comment:

Fife Matters Key Diagram now depicts the area of St Andrews and surrounding area as St Andrews World Class and Medium Scale Expansion replacing the Green Belt area as shown on the approved Structure Plan Key Diagram.

Response:

The Finalised Structure Plan at Policy ENV1 makes a commitment to the designation of a Green Belt round St Andrews and a proposed boundary is depicted in the draft St Andrews and East Fife Area Local Plan. St Andrews World Class is not depicted on the Finalised Plan Key Diagram. The Key Diagram cannot depict every policy for every area as it would become cluttered and unhelpful.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Proposed strategy for St Andrews runs counter the aims of the approved Structure Plan of protecting St Andrews from further development by an encircling Green Belt.

Response:

Approved Fife Structure Plan 2002 (FSP) at Policy SS8 does not place the level of restriction suggested in this response. FSP at paragraph 2.1.14 made it clear that "robust defensible boundaries to apply over the Plan period (2001 – 2011) and beyond will be defined in Local Plans to reflect a balance between containment and urban growth." In addition Paragraph, 2.1.15 states Local Plans' definition of Green Belt boundaries, including any village envelopes, may reflect existing and planned urban boundaries where further urban development would be acceptable."

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The proposals for the expansion of St Andrews are contrary to the conclusions of the St Andrews Strategic Study. In particular it is contrary to the conclusion which stated St Andrews was at its landscape capacity and no major expansion should take place and one of the themes for the future – Maintaining the unique identity of St Andrews including its landscape setting.

Response:

The proposed level of development as proposed in Proposal H2 of the Finalised Structure Plan is strategic scale in excess of 300 houses for the Plan period. Proposal H2 indicates that the land will be provided by both brownfield and greenfield sites. The Finalised Plan allocates 1,200 houses to St Andrews.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Landscape study by Alison Grant on behalf of Fife Council concludes "no site has been identified which is free from landscape constraints." Summary map shows category 2 and 3 sites capable of accommodating some development and the remaining land defined as category 5 "where development is inappropriate." It is considered there is no capacity for expansion as proposed in Fife Matters.

Response:

Comments re landscape studies noted. However, the landscape assessment is one of a number of factors to be taken into account when considering the future of an area. Landscape cannot be a sole determining factor. It will be fully taken into account in delineating the areas for future development and the Finalised Structure Plan makes provision for minimising the impact of new development including the production of Master Plans and design briefs.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Affordable housing could be located where Tyldesley and Grant suggest housing could be accommodated.

Response:

In the interests of mixed and balanced communities, affordable housing should be dispersed throughout communities and not concentrated in single developments. The precise location is a matter more appropriately addressed by the St Andrews and East Fife Local Plan.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Affordable housing must remain affordable in perpetuity.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Objectives and policy ENV1 do not give the level of protection given by FSP Policy SS8. FSP Policy SS8 must be retained.

Response:

Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which will also identify the boundaries.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

St Andrews Green Belt should include all of the land that forms the context and setting of the town in the landscape. Protecting critical views is not sufficient.

Response:

The approved approach in the Finalised Structure Plan is set out in the Report of Survey. The Policy does not intend the Green Belt for St Andrews to be a restrictive, continuous "no go area" around St Andrews.

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Built Environment

Comment:

Environmental protection of St Andrews is justified because of its importance to residents and maintaining tourism, and on the basis of sustainability and long term importance of St Andrews nationally and internationally.

Response:

The Finalised Structure Plan is supportive of protecting and enhancing the environment of all the settlements in Fife including St Andrews. Policy ENV1 identifies Green Belt for St Andrews to preserve the character, setting and views into and from the historic cores.

The Finalised Structure Plan Policy ENV1 will give the St Andrews Green Belt a positive role in the future development of St Andrews and gives clear guidance about what development will be considered appropriate.

Action:

Revise Policy ENV1.

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

St Andrews is world class destination and does not need to be developed. Historic core needs to be sensitively maintained and landscape setting needs to be protected.

Response:

World Class status agreed. There is, however, scope to accept development and secure improvements, undertaken in a sensitive manner, which will improve experience for both local people and visitors alike.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Fife Council should consult and properly take account of local knowledge and opinion not try to impose Scottish Enterprise / Fife Council "improvements".

Response:

The "improvements" were the subject of public consultation exercises. The "improvements" were the subject of a planning application and the suggestion that Scottish Enterprise Fife tried to impose them is not supported.

Action:

No Change

Comment No: 13

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Investment should be made in rail link and an underground or multi-storey car park on edge of historic core.

Response:

Proposal PT1 of the Finalised Structure Plan (Draft Plan Proposal PT2) confirms commitment to further consideration of transport link options for St Andrews to the rail network, to be addressed through the review of the Local Transport Strategy.

Action:

No Change

Comment No: 14

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Affordable housing should not be funded out of planning gain.

Response:

The provision of affordable housing through the planning system is a legitimate means of contributing to meeting the needs for affordable housing. This is supported by the Scottish Executive's planning policy. Many local authorities throughout Britain are using this approach. It is acknowledged however, that the planning system can only make a contribution to meeting the shortfall; it cannot address it in entirety. The Finalised Structure Plan refers to planning requirements rather than gain.

Action:

Sprent, J I - Wormit, Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Considers that negotiations with developers address energy efficiency issues. The discussion should not be restricted to insulation, etc, but also address fuel sources and Combined Heat and Power should be promoted for both domestic and other small scale applications.

Response:

Policy SS1 of the Finalised Structure Plan requires account be taken of the need to raise energy efficiency when identifying sites for development in Local Plans and in the assessment of other development proposals. Development Plan is supportive of CHP Schemes and use of biomass.

Action:

Policy R1 and R2 of Draft Plan now transferred to Area Local Plans.

Condie, Alex

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Welcomes Plan and also welcomes the draft strategies as a basis for discussion.

Response:

Welcome for plans and strategies noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Considers there should be an identified lead agency to implement plan as many proposals made in the past have not been progressed at an adequate pace.

Response:

Note comments re lead agency for implementation. The Development Plan process now has to be accompanied by the Action Plan, a document which is to be revised every two years, which is intended to maintain the focus on implementation. Fife Council is becoming more proactive in relation to development and this should work towards addressing this aspect.

Action:

Hutchison, Robert - Glenrothes

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

With regard to Draft Plan Policy DC2 Developer Requirements considers this should include provision for funding for improving quality of existing housing stock.

Response:

Planning gain must be related to meeting needs generated by new development and ensuring new development is sustainable. Housing improvements are the responsibility of owners of property whilst not stated explicitly, this is an option that could be considered in detail. Draft Plan Policy DC2 now Finalised Plan Proposal DC1.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Concerned that Fife Matters places Glenrothes in a secondary supportive role to Kirkcaldy as it is considered account should be taken of the size of Glenrothes and its strategic geographical location at the very centre of Fife.

Response:

In terms of population Kirkcaldy is the largest town in Fife followed by Dunfermline and then Glenrothes. As such it also has the largest town centre in Fife. It is therefore the main centre in Mid Fife. The strategy of the Structure Plan reflects this role. However, the Plan also recognises Glenrothes' position as one the largest towns in Fife. It allocates employment land for the town, identifies a strategic allocation of 900 houses at Glenrothes East (albeit reduced in scale from the consultative draft Structure Plan) and specifically mentions Glenrothes town centres in retailing policies

Action:

Morton, John - Markinch, Glenrothes

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Considers there is too frequent mention University of St Andrews which should have less emphasis and would like to see more mention of Dundee and Abertay University.

Response:

The Structure Plan is a strategic planning document which sets out proposals for development in Fife. St Andrews University offers the potential for positive benefits for Fife reflecting the National Planning Framework for Scotland. There is no reason to mention other establishments outside Fife in the Finalised Structure Plan.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Lauder, Fife and Glenrothes Colleges do sterling work in Fife and should be recognised in the Plan.

Response:

Agreed. Fife Council is supportive of the contribution of the Colleges to providing for lifelong learning opportunities which has a positive contribution to improving the Fife economy.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Do not object to suggested growth to 2026 but consider it should not be promoted as low of Fife's towns could sustain large scale growth. Any increase in Fife's population is likely to be driven by incomers who commute to Edinburgh or Dundee. Local Industry vital of Fife is to retain its character.

Response:

The Finalised Structure Plan makes provision for land for both residential development and employment purposes. Fife Council and its partner organisations are actively pursuing the creation of new employment opportunities in Fife.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Road network unlikely to be capable of accommodating proposed population increases.

Response:

The Finalised Structure Plan has identified areas for development which provide good access to the public transport network. However, where necessary, improvements to the roads system will be secured.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Rural Economy

Comment:

Many rural areas could not support any significant increases in population.

Response:

The Finalised Structure Plan directs most of the new growth to existing settlements and extensions of existing settlements. Local Plans will identify and provide for local needs in smaller settlements and villages. There are no proposals for major new housing development in the countryside, although it is important to sustain rural communities.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

There is excessive mention of diversification which appears, particularly in Mid Fife to mean the replacement of manufacturing industry by service industry. Considers it would be good if Fife would stand out against the trend.

Response:

Noted. It is difficult to go against national trends and unless an area moves with the trends it will be left behind. However, equally, Fife Council is aware of the potential offered by the manufacturing skills base in the area and the proposals for Methil Waterfront are an example of how Fife is seeking to capitalise on these skills.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Glenrothes is the county town of Fife in all but name. Of the larger settlements in Fife it is one with the most room and best infrastructure for expansion. Considers that Glenrothes is portrayed as playing second fiddle to Kirkcaldy as regards Mid Fife and considers this is a mistake.

Response:

Whilst Glenrothes has almost the same population as Kirkcaldy on the basis of the nationally produced retail based rankings, Kirkcaldy is noticeably higher than Dunfermline and Glenrothes. It is considered that promoting two competing centres in such close proximity within Mid Fife would benefit neither town. It is also considered that greater benefits will accrue to Mid Fife by promoting Kirkcaldy as the main centre, building on its existing strengths and securing the benefits that can be derived from this.

This does not mean that Glenrothes is ignored by the Finalised Structure Plan. For example Policy S1: Town Centres clearly indicates that Glenrothes is one of the main town centres in Fife where retail and leisure development will be directed to. It is also one of the Strategic Development Areas where major growth is proposed.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Considers the East Coast Main Railway Line takes a tortuous route through Fife. Could be rerouted from Inverkeithing via Kinglassie and Fife Airport and Glenrothes to rejoin the existing line north of Glenrothes.

Response:

Noted. Comments passed to Transportation Services.

Action:

No Change

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Alternative approach would be to construct a light rail system linking Markinch Station and Glenrothes.

Response:

Noted. Comments passed to Transportation Services.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Freight Transport

In order to facilitate the transport of freight – suggests the following:

- 1. Branch line between Inverkeithing and Rosyth Europarc should be developed for freight (containers) and passenger services.
- 2. Utilise EWS coal sidings at Thornton as freight distribution centre.
- 3. Sidings at Halbeath could be turned into a freight depot for Dunfermline etc.
- 4. At Levenmouth rail / sea / river transfer would be possible using barges on the River Leven.
- 5. Existing stations could have small goods yards for local freight distribution.

Response:

Noted. Comments passed to Transportation Services.

Action:

No Change

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

Supports Finalised Structure Plan seeking to support town centre shops as against out-of-town retail parks.

Response:

Support noted.

Action:

No Change

Comment No: 12

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

Considers there is an acceptance of the continuing decline of retail services in smaller communities.

Response:

This is not the case. Fife Council is aware of the importance of supporting retailing in smaller communities. Specific support for smaller centres is given by Policy S1.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

Would like to see stricter controls over change of use, especially from shops to residential.

Response:

Fife Council must operate within the terms of existing legislation and national guidance and consider each proposal in the light of the Development Plan and other policy guidance.

Action:

No Change

Comment No: 14

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Density

Comment:

Concerned that applying standard density of 25 houses per hectare will prevent development of houses with large gardens.

Response:

The Finalised Plan Policy H6 (Draft Plan Policy H8) has been amended to reflect the wider concerns raised in respect of the consultative draft policy.

Action:

Changes have been made to the Finalised Plan Policy H6 in response to the wider comments raising concern in respect of the consultative draft policy.

Comment No: 15

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Design Quality

Comment:

Concerned that new development should match the character and facilities of the area.

Response:

It is considered that through good design higher densities can be achieved without compromising character of surrounding areas.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Any sizeable development (e.g. in excess of 50 houses) should not go ahead unless the surrounding infrastructure is adequate or made adequate as part of the development.

Response:

It is current practice not to support proposed development which cannot be serviced.

Action:

Dean, Peter N - North Queensferry, Inverkeithing

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Land for services and facilities in new areas to be developed should be identified in advance. This did not happen with the Dunfermline Eastern Expansion Area. (DEX)

Response:

DEX is being developed according to a master plan for the area. The allocation of land for various purposes within the areas proposed for development in the Finalised Structure Plan will be made via the Area Local Plans and masterplans will provide more specific details about proposed land uses.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

To understand Fife Council's plans for Dunfermline a macro view is necessary and Fife Matters must identify focal growth points.

Response:

Chapter 1 of the Finalised Structure Plan sets out the Development Strategy for Fife whilst the Settlement Strategy contained in Chapter 2 identifies the proposed Strategic Development Areas and Other Strategic Land Allocations.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Suggests that the two issues – providing housing for people from Edinburgh and regeneration of central Fife are linked.

Response:

Agreed. This is part of the Development Strategy

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Suggest that the proposed (transport) interchange points are not located in places such as Halbeath and Ferry Toll and developed in the new development locations.

Response:

The Strategic Land Allocations are all focused in areas with high public transport accessibility or where new rail stations are proposed.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Suggest that the proposed (transport) interchange points are not located in places such as Halbeath and Ferry Toll and developed in the new development locations.

Response:

The locations of Park & Ride/Park & Choose sites have been identified through the Local Transport Strategy. They are located to maximise accessibility from both existing and proposed development areas and to improve travel choices for a wide catchment population.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Is concerned about the potential for sudden, drastic changes to the size of villages due to factors outwith their control.

Response:

Under the current planning system all new development should be consistent with the approved Development Plan. The Finalised Structure Plan sets out major and medium scale development proposals and any development proposals for the future development of any villages will be identified in the emerging Area Local Plans. North Queensferry is located within the new Dunfermline and West Fife Area Local Plan which is programmed for publication in Draft form in 2007.

Action:

Lambert, Robert - Glenrothes

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Wishes to know why there is no upgrade planned to A92 north of Glenrothes to Tay Bridge.

Response:

Upgrading of the A92 is the responsibility of the Scottish Executive, through the agency Transport Scotland. Finalised Structure Plan Proposal PT1 (Draft Plan Proposal PT2) supports upgrading works to enhance connectivity from Mid-Fife to Dundee.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

Understands St Andrews has a Trust Fund funded through golf. Wishes to know why this money is not used to develop road and rail links for the community.

Response:

This is an issue to be raised with the Trustees of the fund. Not a strategic planning issue.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

With Glenrothes being the third largest population centre in Fife, why is it not linked to the rail network?

Response:

The Finalised Structure Plan incorporates the key strategic transport proposals for Fife as identified through the Local Transport Strategy (LTS) and transport modelling work in support of the Plan. At present Glenrothes is served by stations at Markinch and Thornton and any future expansion of the rail network would be addresses via the LTS or Regional Transport Strategy.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Leisure Facilities

Comment:

National Planning Policy Guideline 11: Sport, Physical Recreation and Open Space requires planning authorities to set out long term vision for meeting sporting and recreational needs. Why does the Structure Plan not make provision for open space, and sporting and community facilities?

Response:

The Finalised Structure Plan addresses strategic issues and the provision of land for open space, sport and other community facilities will be considered through the Local Plan process. The preparation of these Plans will be the subject of widespread public consultation. Other recreational needs cannot be met by the public sector, however, in such cases, the Local Plan could reserve land for other uses to be developed by the private sector.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Proposed rail link to Levenmouth is a step in the correct direction.

Response:

Support noted.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Concerned that there is no proposed upgrade for the A911.

Response:

Policy DC1 of the Finalised Structure Plan and the Action Plan refer to the requirement for strategic road improvements in relation to the Levenmouth Strategic Development Area. The masterplanning process will determine the detail of projects required to improve road access between Levenmouth and the strategic road network.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Questions why planning permission should be granted for any housing before decent infrastructure is provided.

Response:

The Finalised Structure Plan seeks to ensure that appropriate infrastructure is delivered in relation to proposed development. Policy DC1 and Proposal DC1 set out the developers requirements and community benefits associated with each Strategic Development Area and all new development.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Questions how Fife's education system will be turned round a) to provided the skilled and well trained workforce and b) to provide the range and quality of educational opportunities and maximise opportunities for Fife's population.

Response:

Fife Council with partners continue to further training and education opportunities. The Fife Economic Development Strategy "Growing Fife's Future" sets out a number of actions in this regard.

Action:

No Change

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Questions why Kirkcaldy is being promoted as the heart of Mid Fife and why Glenrothes will be a "focus for retail development".

Response:

Working towards boosting Kirkcaldy to regional centre status, with Glenrothes playing a supporting role, would ensure that neither suffer any detrimental effects from direct competition and that greater benefits accrue to Mid Fife and Fife as a whole. The decision to pursue this approach has been taken after a full consideration of retail provision in Fife.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Glenrothes

Comment:

Questions why land is allocated in Glenrothes for housing and employment, when it is unlikely to be required.

Response:

The housing and employment land allocations for Glenrothes have been made following thorough research, as detailed in the Report of Survey. As a result of work carried out since publication of the Draft Plan, the greenfield element of the strategic housing allocation for Glenrothes has been reduced, to make the most of brownfield opportunities within the town and part of that draft allocation has now been allocated to East Kirkcaldy Strategic Development Area.

Action:

Reduction in strategic housing allocation for Glenrothes from 2,450 to 900 units.

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Glenrothes

Comment:

Are the proposed developments for Glenrothes likely to protect the character of adjacent communities?

Response:

Future development in Glenrothes will be considered in relation to development plan policy which seeks to maintain the characters of existing communities. The Kirkcaldy and Mid Fife Local Plan will provide further detail.

Action:

No Change

Comment No: 12

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Public Transport

Comment:

Paragraph 205 of the Draft Plan states that key linkages to the public transport network are required for Glenrothes, but only planned improvements are to Bankhead roundabout and the A911.

Response:

Proposal PT1 of the Finalised Structure Plan (Draft Plan Proposal PT2) lists the strategic transport proposals which are significant for Fife over the plan period 2006 - 2026. The Local Transport Strategy and Area Transport Plan gives greater coverage and detail of transport projects at the local level and mechanisms for delivery.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

Questions the justification for a further 90 ha of business land in Glenrothes.

Response:

Following further research, the site at south east Glenrothes has been deleted from Proposal PE1. This reflects a review of employment land requirements over the plan period, which will be further reconsidered through the Kirkcaldy and Mid Fife Local Plan.

Action:

Amend Proposal PE1.

Loveday, Karen A. - Dalgety Bay, Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Concerned about land being used for building houses as it is spoiling the beautiful countryside that I live in. Please finish the houses and please stop.

Response:

Concerns noted. There is a need for land for new houses which cannot be met through building only on previously developed land. Where greenfield sites are identified for development, a range of factors, including protection of the countryside, are taken into account.

Action:

Ward, Corrie - Ladybank, Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

More affordable housing has to be built. Suggests Fife Council should be at the forefront of the movement for affordable housing and insist on more affordable dwellings.

Response:

The housing policy objectives of the Finalised Structure Plan indicate that Fife Council is seeking to maximise the delivery of affordable and special needs housing. Support for proactive approach noted. Whilst the planning system cannot meet the shortfall in entirety it can make a valuable contribution. Fife Council will actively pursue a range of means to address this shortfall.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Many houses built in Ladybank but too few are affordable.

Response:

Policy H4 of the Finalised Structure Plan (Affordable Housing (Draft Plan Policy H5)) seeks to delivery 20% affordable housing from housing sites in the Cupar Housing Market Area. Ladybank is part of the Cupar Housing Market Area.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Considers there is no over-development in the Ladybank area. Considers there are brownfield sites in Ladybank but considers these have not yielded more than 2 affordable houses.

Response:

This is not a strategic planning issue and as such it is more properly addressed by the St Andrews & East Fife Local Plan. Comment will be addressed in that context.

Action:

Forbes, Gilbert - Glenrothes

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Sustainability

Comment:

Does not consider North Glenrothes is a sustainable community and does not match criteria mentioned in para 1.25. Suggests measures to improved footpath and public transport linkages to Glenrothes Town Centre.

Response:

Comments noted. Improving local transport linkages is addressed through the Area Local Plan and the Central Area Transport Plan. The pre-draft consultation for the Kirkcaldy and Mid Fife Local Plan is underway, with the draft Plan programmed for March 2007. Comments passed to Local Plan team and Transportation Service.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Leisure Facilities

Comment:

Lack of facilities in North Glenrothes such as pubs, hotels, entertainment centres.

Response:

The facilities mentioned are not provided by local authorities. However the allocation of land for commercial developments will be considered in the context of the Kirkcaldy and Mid Fife Local Plan.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Much of congestion in Edinburgh is caused by the number of education establishments. Fife should promote relocating some of the Edinburgh centres.

Response:

Comments noted. The Finalised Structure Plan supports the development of a new higher education campus in Fife to substantially enhance the number of residents holding a degree. Fife Council will work with education establishments to facilitate future proposals.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

Much of Edinburgh congestion caused by the excessive number of health establishments there. Fife should point out that the NHS is seriously deficient in providing access to major hospitals because of Forth Valley transport problems and should transfer more health facilities to Fife. Risks involved in travel in heavily congested transport far outweigh risk of lack of medical expertise.

Response:

The provision of health care facilities is an issue for NHS to determine.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Agree with contents of para 1.19 but should consider the risk of disruption caused by accidents say on the major road network including the Forth Road Bridge / or the main rail network.

Response:

Points noted. Multi-modal bridge would provide an solution as and when problems arise on the existing bridge. Impracticable to duplicate road and rail network on the basis the possibility of temporary closures due to accidents.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

Some of language used unwieldy. Fife Matters will not win Plain English award.

Response:

Noted. The document will be edited prior to finalisation taking account of your comments.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

Concerned that Glenrothes North is effectively cut off from the rest of Glenrothes by river and park. Public transport links poor.

Response:

Your comments re the lack of linkages have been passed to the team responsible for preparing the Area Local Plan and to Transportation Services.

Action:

Craik, Lindsay - Crossford, Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Para 1.14. Considers use of word "concentric" is inappropriate to the geometry of Dunfermline and should be removed.

Response:

Word has been deleted from revised Para 1.14 in Finalised Plan.

Action:

Re-word Para 1.14 to delete reference to "concentric".

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Suggests housing should be encouraged at the heart of revitalised city centre.

Response:

There is no presumption against residential uses in centre of Dunfermline. Emerging Dunfermline and West Fife Local Plan (DWFLP) is likely to address this issue and allocate appropriate sites.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Natural Environment

Comment:

Para 1.28 of Draft Plan Wetlands, however, small, around settlements should be protected and designated Green Belt. An example of this is at Crossford bounded by Abbeyview, Craigbank and Logie and has continuous support for indigenous and migratory birds.

Response:

Nature conservation features are currently protected under the terms of policies in the approved Structure Plan. The policy protecting locally significant nature conservation features will be included as a core policy in the Dunfermline and West Fife Local Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Para 2.4 Include: regeneration of the Forth Coast from Limekilns to Culross to thereby encourage increased attraction for leisure use and tourism on the upper Forth.

Response:

Noted. The area mentioned is not a priority area for strategic action. May be potential to partially address by Local Plan initiatives.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Para 2.5 – add to first para: Develop the City Centre as a prime tourist destination using York as a model.

Response:

Noted. Consider that the Finalised Structure Plans contains numerous references to improving Dunfermline city centre. Policies on Town Centres are supportive of encouraging diverse developments which in turn encourage visits from local people and tourists alike.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Draft Plan Proposal PT2 – add para stating Active encouragement should be given to a Fife bypass road (dual carriageway) from Kinross to Kincardine Bridge to assist the alleviation of pressure on the Forth Bridge by attracting through traffic to the motorway system to the south and vice versa.

Response:

This is not a strategic planning issue. Draft Plan Proposal PT2 now Proposal PT1 of Finalised Plan.

Action:

Cook, Dennis J - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Considers the planning proposed is based on no more than dumping another lot of homes somewhere convenient to Edinburgh and objects to this.

Response:

Objections about the number of houses proposed to be built in the Dunfermline area have been noted. The Finalised Structure Plan identifies a housing need for the Dunfermline and West Fife Area over the period 2006 to 2026 as 9,200 houses. However land for 3,820 houses has already been identified and this leaves a shortfall of 5,380 houses. Of this shortfall 4,550 houses would be in the Strategic Development Area to the south west/west/north of Dunfermline.

Fife Council is required to ensure land for housing is brought forward via Structure and Local Plans. Fife Council's proposed strategy is to concentrate new greenfield land release in a number of planned extensions to existing settlements close to the public transport network and other services.

The detailed identification of the development areas will be undertaken through the Dunfermline and West Fife Local Plan (DWFLP). Public consultation will be undertaken during this process.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Since other growth points in Fife have been largely taken up by people working in Edinburgh, why not expand Edinburgh?

Response:

As explained in Chapter One of The Finalised Structure Plan, Fife Council considers that there is an opportunity to secure a number of benefits which can be derived by attracting new housing development which will provide houses for both local people and people moving into Fife from Edinburgh and elsewhere. These benefits include the regeneration of a number of areas of Fife and creating employment opportunities. The proposed new housing including that in the Dunfermline Strategic Development Area is not totally commuter led as you suggest. An element of the housing land provision is required to meet forecast local needs for the 20-year plan period.

Action:

McCran, Paul J B - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Concerned about the 'affordable housing' aspect of the proposed expansion. Wishes to know definition of affordable housing before deciding whether to support or oppose proposals.

Response:

Affordable Housing is defined in the Glossary of the Finalised Structure Plan and this is the same as that used by the Scottish Executive in National Planning Guidance. It is defined as "Housing of a reasonable quality that is affordable to people on modest incomes. In some places the market can provide some or all of the affordable housing that is needed, but in other places it is necessary to make housing available at a cost below market value to meet an identified need."

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Infrastructure

Comment:

Why should it be considered necessary for people already living in Dunfermline to put up with more road congestion, railway inconvenience, plus over-stretched schools, hospitals etc.?

Response:

Any new development would require additional service provision. The Finalised Structure Plan makes it clear that the necessary road, education, health care, and other facilities to service any new development would be provided at the appropriate time.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Dunfermline Town centre has been and still is a disaster area and people will not shop there.

Response:

Comments noted. The Finalised Structure Plan provides the framework for working towards increasing the attractiveness of Fife's town centres, including Dunfermline. It identifies Dunfermline as being a key sub regional centre. Policies S1 and S2 make specific mention of Dunfermline.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Forth Road Bridge is another problem without a solution until the far distant future.

Response:

Noted. The Finalised Structure Plan gives support to consideration of an additional multi-modal Forth Crossing and Fife Council, through membership of the Forth Estuary Transport Authority and Regional Transport Partnership, will continue to identify and support improvements to the transport network.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Suggests deferring development until necessary infrastructure including the new multi-modal bridge is in place.

Response:

In order to secure what Fife wants for the future the Finalised Structure Plan must set out clearly what it needs and identify the infrastructure necessary to implement it. A wait and see approach gives out a message implying a lack of conviction for the proposals. The Plan will be reviewed and any necessary amendments caused by any hold-ups in the delivery of infrastructure can be addressed.

Action:

McCran, Marcus - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Concerned about the provision of education facilities required to serve any new development.

Response:

Fife Council is aware of the situation with regards to education and the appropriate Services have been liaising to identify the level of provision required to service any proposed new development. The Finalised Structure Plan identifies the needs for education in general terms in Proposal DC1 of the Finalised Plan and this would be delivered, via developer contributions and other mechanisms, when necessary. Fife Council is currently undertaking an assessment of the provision of education facilities which is intended to improve the delivery of education services. This will take account of housing land allocations within the Development Plan. Details of the Shaping Future Schools for Fife exercise are available on www.fifedirect.org.uk or from Fife Council Education Service.

Action:

Policy DC2 of Draft Plan is now Proposal DC1 of Finalised Plan.

McCran, Brian - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Has a complete lack of confidence in management system that has allowed the Dunfermline Co-op building to lie empty.

Response:

Comments are noted. Fife Council has been actively pursuing action on the Co-op Building over the last few years and secured the Order which resulted in the demolition of the building. Fife Council is pressing the owners to progress the redevelopment of the site. This however is a site specific issue more appropriate to the Dunfermline and West Fife Local Plan.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Concerned about the Dunfermline Eastern Expansion Area (DEX), when you consider thousands of houses have been built without any meaningful community infrastructure.

Response:

Concerns are noted. DEX is the subject of a master plan with has made provision for land for a number of the facilities you mention. Land has been reserved for two primary schools in the Dunfermline Eastern Extension Area (DEX) and Fife Council has obtained full planning permission to develop both sites.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Concerned the western expansion will result in same problems that have arisen in the DEX area. Also concerned about the impact of construction traffic on roads to the west of Dunfermline.

Response:

The Finalised Structure Plan identifies a housing need for the Dunfermline and West Fife Area over the period 2006 to 2026 as 9,200 houses. However land for 3,820 houses has already been identified and this leaves a shortfall of 5,380 houses. Of this shortfall 4,550 houses are proposed in the Strategic Development Area to the south west/west/north of Dunfermline from 2011 and 2026.

Fife Council is required to ensure land for housing is brought forward via Structure and Local Plans. Fife Council's proposed strategy is to concentrate new greenfield land release in a number of planned extensions to existing settlements close to the public transport network and other services. This is the preferred approach.

The detailed identification of the development areas would be undertaken through the Dunfermline and West Fife Local Plan (DWFLP). Public consultation will be undertaken during this process.

The Dunfermline option will, as well as encouraging development in locations that increase accessibility to homes, employment and services, the Local Planning and Masterplanning processes would guide development away from locations where traffic generated by the development would not adversely impact on local communities.

Traffic issues, including any potential impact on Forth Street and Limekilns Road, would be addressed in order to ensure that any new development is properly serviced in order to prevent the problems suggested in your letter.

You should be aware that the proposed development of the 4,550 houses is programmed for the period 2011 to 2026 which is an average of 300 houses per annum. It is unlikely that all the houses would be accessed via Limekilns Road.

Action:

McCran, E.S. - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

Concerned about the impact of the increased number of houses on medical facilities and the ambulance service.

Response:

Concerns noted. Dunfermline option will be pursued and Fife Council's services have been working together with their partner organisations, including the health care providers, to ensure that all necessary new facilities and services would be brought forward when required. The actual level of service provision is not a strategic planning matter and is an issue for the health care providers to determine. NHS Fife is aware of the proposals for growing Fife's population 2006-26.

Action:

Westwater, Michael - Glenrothes

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Formally objects to Draft Structure Plan.

Response:

Formal objection to the Draft Structure Plan noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Concerned about the status of Glenrothes and that a town of the size of Glenrothes is still only being promoted as a district centre on par with smaller towns. Concerned about the proposed relationship between Glenrothes and Kirkcaldy.

Response:

Concerns with regard to the status of Glenrothes and the proposed relationship between Glenrothes and Kirkcaldy are noted. Concerns that Kirkcaldy is being promoted as the "main centre at the heart of mid-Fife" while that Glenrothes is only rated on a par with St Andrews, Cupar, Cowdenbeath and Leven are also noted.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Please note contents of Glenrothes New Town Master Plan.

Response:

The Glenrothes New Town Master Plan, which was produced forty five years ago, has no current status as a planning document.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Page 7 of Fife Matters describes Kirkcaldy as a regional centre.

Response:

The description of Kirkcaldy on page 7 of the Draft Structure Plan as a regional centre was correct. However, the Finalised Structure Plan makes it clear that it is an aspiration to grow Kirkcaldy to become a regional centre.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Kirkcaldy Town Centre is constrained thereby restricting potential for new development.

Response:

Noted. The Adopted Kirkcaldy Area Local Plan identifies a number of sites in the town centre which have potential for redevelopment. The forthcoming Kirkcaldy and Mid Fife Local Plan will progress matters further.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Glenrothes lacks quality retailing and offers very limited and social provision.

Response:

The Finalised Structure Plan contains several references to Glenrothes. Policies S1 and S2 make specific reference to promoting leisure and retailing in the town albeit within a strategic framework. The provision of private leisure facilities such as commercial cinemas is a matter to be addressed by the private sector. There is scope to consider new community facilities in the context of developer contributions arising from new development in the Glenrothes area. Policy S1 of the Finalised Structure Plan aims to encourage a diversity of uses in the larger town centres including Glenrothes.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

No mention of any commitment to improvements to Glenrothes town centre.

Response:

The Finalised Structure Plan contains several references to Glenrothes town centre. Fife Council 's degree of involvement in any development/re-development proposals for Glenrothes town centre is restricted as the Kingdom Centre is in private ownership. However, Policies S1 and S2 of the Finalised Structure Plan make specific reference to Glenrothes.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Retail Policy

Comment:

Retail focus should be on the town centres, yet plan allows for further retail development at Fife's other retail parks, but not in Glenrothes. Does this mean that if any retailing plans for Glenrothes, but outwith the centre were submitted then they would not be approved? If so, wishes to object.

Response:

The retailing strategy of the Finalised Structure Plan does focus on town centres, including Glenrothes, but not exclusively so. This is in line with the sequential approach in national guidance. Policy S3 has been changed to acknowledge the role of retail parks. As with all applications for planning consent, retailing proposals for Glenrothes will be treated on their merits.

Action:

Revise Policy S3.

Udall, Robert D - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

In the light of failing industry, shortages in labour skills and a population migration of 470 per annum (Report of Survey) it is unlikely that the Fife figure has any foundation whatsoever.

Response:

The vision of the Structure Plan includes growing Fife's population to 370,000. However this is entirely consistent with the National Planning Framework. The focus of the Plan's strategy is very much on regenerating Mid Fife. This growth strategy is holistic however, and also involves increasing employment opportunities, reducing economic disparity and maximising wealth creation. In West Fife the strategy is to continue to increase the population albeit at a reduced level compared to the present.

Reference to the GRO's projected population growth of 2% is noted. Given recent levels of migration this appears at first sight to be very low. However this masks other demographic factors. Without inwards migration, Fife's population would decline as there are consistently more deaths than births. Fife's population is also ageing, leading to an imbalance. The average household size is decreasing meaning that a substantial amount of new housebuilding is required simply to maintain population at current levels.

Reference to the amount of vacant stock in Fife – approximately 4,700 units – is noted. Whilst this may seem a lot, it is not excessive, when compared to other local authority areas. There are many reasons for that housing may lie vacant. These include, housing awaiting demolition, uninhabitable stock, stock awaiting repair, death of owner/occupier, and last but by no means least normal turnover. At any point in time, a proportion of the stock is vacant simply because new owners or occupiers are in the process of moving home. That said Fife Council's Housing Service is involved in a number of initiatives to minimise the amount of housing lying vacant. In short the amount of vacant stock does not exert much influence over the housing land requirement.

Action:

Demographics work has been updated, the details of which are contained in the Report of Survey.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

DEX will provide an estimated 6,500 new houses. Taking account of this and other factors there is an over-provision of housing land in the Dunfermline area.

Response:

Suggestion noted. The anticipated output from the Dunfermline expansion area will be slightly over 5,000, although this could change slightly as detailed permissions are granted. A substantial element of the housing land requirement is to meet local needs.

Dunfermline is identified in the Finalised Structure Plan as a Strategic Development Area, allocated for 4,550 new houses and 80ha of employment land. The housing allocation is primarily driven by decreasing household size, with a factor for in-migration. The detail of the housing land requirement is set out in the Report of Survey.

Building the 9,200 proposed new houses in the Dunfermline housing market area would not result in a proportionate increase in population. This is because the average size of households is decreasing, and is expected to continue decreasing in the foreseeable future. The Scottish Executive has calculated that the average household size in Fife will fall from 2.17 persons in 2006 to 1.85 persons in 2026. This is due to a number of socio-economic factors such as the trend towards smaller families and more relationship breakdowns. In essence therefore, approximately 2,000 of the 9,200 new identified in Finalised Structure Plan to be built over the period 2006-26 in the Dunfermline housing market area will simply maintain Dunfermline's population at current levels.

Action:

No change.

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Mechanism to operate affordable housing policy not made clear in documents. Will it be a Fife hybrid or follow the ODPM plan to boost home ownership?

Response.

Affordable housing is identified in the Plan as being of the key issues to be addressed. The Plan sets out the broad approach to be followed and includes a broad definition of what this means. This is consistent with Scottish Executive Guidance. It includes a range of house tenures such as social housing for rent, low cost housing for sale, and shared ownership. An element of affordable housing is provided by Communities Scotland investment funding and this will continue, and indeed increase.

The Supplementary Guidance on Affordable Housing provides more detailed information on the Council's approach through the land use planning system.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

Considers the allocation of industrial land to the west of Dunfermline is not supportable and any allocation of land should be on the eastern side of Dunfermline. Providing land is not the answer and marketing is necessary. Land West of Dunfermline has been mined and would require expensive stabilisation.

Response:

The Finalised Structure Plan makes provision for the ongoing supply of land for employment purposes. Proposal PE1 identifies 80 hectares in the Dunfermline Strategic Development Area and indicates the preferred use is Business (office, storage or light industry). The Dunfermline area has a good track record in attracting business employers and it is located within the West Edinburgh/South Fife Key Economic Development Zone which has been identified by Scottish Enterprise and is recognised by the National Planning Framework for Scotland. The area to the west of Dunfermline is well located in terms of its proximity to the public transport network to support the implementation of Travel Plans which seek to reduce the use of private cars. Allocation of housing and employment land in close proximity reduces need for travel.

Comments with regard to ground conditions are noted. Ground conditions can be assessed by site investigation works and buildings designed and constructed to take account of them.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Dunfermline

Comment:

Object to the Western Extension as it is considered that it makes an over-provision of housing and industrial land.

Response:

The Finalised Structure Plan Proposal H2 indicates the development of the proposed Dunfermline Strategic Development Area would not commence until 2011. The Finalised Structure Plan Policy H1 indicates that until 2011 there is no shortfall of housing of housing land. The Dunfermline Eastern Expansion Area (DEX) is incapable of supplying the greenfield land requirements after 2011.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Land to the south-west of Dunfermline between Lovers Loan and Lynne Burn historically subject to flooding.

Response:

The issue of flooding will be fully addressed in the context the guidance issued by the Scottish Executive in conjunction with the Scottish Environment Protection Agency (SEPA) when the Dunfermline & West Fife Area Local Plan (DWFLP) is being prepared. Full account will be taken of the water table and ground materials in designing any structures. Any new development would incorporate Sustainable Urban Drainage Systems (SUDS), like those currently in operation in DEX, to control surface run-of rates (see Policy SS1 of the Finalised Structure Plan).

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Water and Drainage

Comment:

Waste water from new properties cannot be drained by gravity and pumping required.

Response:

The development of land is not inhibited by the requirement to pump waste water. The technique is used in a number of locations where gravity systems cannot be developed.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

- Any development on the south-west / west (of Dunfermline) will impact on views of the Abbey and the Glen. Area south of the Glen along Limekilns Road should not be developed.

Response:

Both the Approved Fife Structure Plan 2002 and the Finalised Structure Plan include a policy (Policy SS8 and Policy ENV1 respectively) supporting the designation of a Green Belt to the west and south west of Dunfermline. The delineation of the boundary of the Dunfermline Green Belt will be undertaken as part of the preparation of the Dunfermline and West Fife Local Plan taking account of the need to protect views to and from the historic core including the Abbey, Palace, City Chambers and the Glen and any future land requirements.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Land west of Dunfermline, north of Urquhart has been mined and would need extensive stabilisation work prior to development

Response:

Undermining is not considered to be a major obstacle to the development of land. There are a number of engineering options to address stability problems including removing the coal and consolidating the backfill, filling the mining voids with grout material, piling through the mining voids down to solid foundations. There is also masterplanning option which would ensure any development would be located so as to avoid the areas identified as unstable. Provided appropriate measures are taken to ensure public safety, the unstable land could be utilised for a range of uses including landscaping, tree planting, car parking and open storage. See Policy SS1 of the Finalised Structure Plan.

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Road communications south-west, west and north of Dunfermline totally inadequate for planned scale of development. Suggest northern bypass Halbeath–Cairneyhill as route to south would only serve southern part of western area.

Response:

The detail of the Dunfermline Strategic Development Area (SDA) will be implemented through the Dunfermline and West Fife Local Plan and masterplanning. The Finalised Structure Plan Action Plan indicates the required infrastructure development for the SDA, subject to biennial review.

Action:

No Change

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

Question recent comment re design life of Forth Road Bridge.

Response:

Your comments with regard to the design life of Forth Bridge and the capacity of the Forth Bridge and the approach roads are noted. Further work is being undertaken by the Scottish Executive on this issue.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Problem not one of capacity of bridge but congestion south of bridge caused by inadequate A8000. A direct motorway M90/M9/M8 link would secure improvements.

Response:

Pre construction works have commenced as part of the works to deliver improvements to the A8000 via a dual carriageway linking the southern end of the Forth Road Bridge some way east of the Echline junction, to the M9 Spur at Kirkliston, at the Humbie roundabout.

Action:

No Change

Comment No: 13

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Forth crossing is a commuter facility and should be afforded priority as such.

Response:

The Forth crossing cannot be considered to be merely a commuter facility. The National Planning Framework for Scotland (NPFS), published by the Scottish Executive in 2004, recognises the Forth crossing as a Strategic Route and part of a Key Corridor and recognises Rosyth, which must be accessed from south of the Forth, as an International Gateway. In addition the Forth crossing has a role to play in the development of the key Aberdeen – Edinburgh- Newcastle corridor. Further, Scottish Enterprise has identified the West Edinburgh/South Fife area as a Key Economic Development Zone and good connectivity between these two areas is essential.

The South East Scotland Transport Partnership (SESTRAN), which consists of Fife Council, 9 other local authorities and FETA, appreciates the regional and national significance of travel across the Forth Estuary. It has therefore commissioned work to develop a range of measures aimed at offering additional choices for travellers over the short, medium and long term between Fife (and the North) and Edinburgh and the Lothians. Whilst this work has not yet been completed, it will of course be necessary to maximise the capacity of the available public transport networks and services in the short to medium term. However, if demand for travel continues to increase, then further capacity for more sustainable forms of travel will need to be facilitated by the provision of a multi-modal crossing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

Strategic desire line north/south is Abington (M74)–Kincardine–Perth.

Response:

This is recognised as a strategic route in the National Planning Framework for Scotland. Proposals for improvements to the Forth crossing at Kincardine are being progressed.

Action:

No Change

Comment No: 15

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Natural Environment

Comment:

Concerned that Fife Matters does not address wider issues in terms of environmental matters and conservation.

Response:

With regard to environmental and conservation policy, the Fife Development Plan, which comprises the Structure Plan and the Area Local Plans and the Minerals Subject Local Plan, will include a comprehensive policy framework. In order to produce a Structure Plan which has a greater strategic policy focus a number of policies have been moved from the Structure Plan to the Local Plans. Moving the policies into Local Plans will not diminish their importance in planning for future development and determining planning applications.

Action:

No Change

Comment No: 16

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Concerned that Fife Matters does not discuss wider issues of the regional road network.

Response:

Finalised Plan Proposal PT1 (Draft Plan Proposal PT2) lists the key strategic transport improvements for the Structure Plan period 2006-2026. The Local Transport Strategy and Regional Transport Strategy consider wider issues.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Concerned that Fife Matters does not discuss wider issues of general industrial/business land.

Response:

The general industrial/business plan is explained in the Finalised Structure Plan at Chapter One and in the section on Business and Employment in Chapter Three.

Action:

No Change

Comment No: 18

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

Concerned that the health care services in Dunfermline are over-stretched.

Response:

With regard to health care matters, Fife Council's services are working together with their partner organisations, including the health care providers, to ensure that all necessary new facilities and services would be brought forward when required.

Action:

Flanagan, Roy - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Concern that many proposals in Fife Matters are fundamentally flawed.

Response:

Concerns about the Consultative Draft Structure Plan are noted.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

The title suggests it is a plan but it does not contain any fundamental characteristics of a plan. No detailed tasks, no detailed timescales, no commercial framework etc. More accurate to define document as "wish list".

Response:

Town and Country Planning legislation requires local authorities to prepare Development Plans for their areas. The Development Plan has two parts. The Structure Plan is the strategic policy document and the Local Plan gives more detailed guidance and detail on an Ordnance Survey map base. The Development Plan is prepared to satisfy legal requirements and it must comply with the guidance on form and content issued by the Scottish Executive. The appropriate Scottish Planning Policy Guidelines, National Planning Policy Guidelines and Planning Advice Notes can be obtained from the Scottish Executive or viewed online at www.scotland.gov.uk. The Plans must be subject of public consultation and the Finalised version of the Structure Plan is submitted to the Scottish Ministers for their approval. At that stage of the process, anyone or any organisation unsatisfied by the contents of the Finalised Structure Plan can submit their comments and/or objections to the Scottish Ministers. The Scottish Ministers may approve the Plan as submitted or modify it prior to approval.

The Finalised Structure Plan clearly indicates that its timescale for implementation is 2006 to 2026.

The Finalised Structure Plan clearly indicates the timescales for development of housing and employment land in the appropriate sections and Chapter 3 sets out how Fife Council intends to secure the development proposed.

It is assumed that the reference to previous Structure Plan documents not having achieved their objectives relates to the Dunfermline Eastern Expansion Area (DEX). Land has been reserved for two primary schools in the DEX Area and Fife Council has obtained full planning permission to develop both sites.

The Scottish Executive is responsible for the construction of the Rosyth Bypass. Whilst currently there is no commitment to this scheme, Fife Council continues to support the proposal.

The information used as a basis for preparing the Finalised Structure Plan is contained in the Report of Survey which is available at www.fifedirect.gov.uk . Information on infrastructure is contained within the Structure Plan Action Plan which accompanies the Finalised Structure Plan. Finalised Plan Policy DC1 and Proposal DC1indicate how infrastructure will be funded. Other housing-related information such as the annual Housing Land Review, which records the situation with regard to the supply of housing land, are also available online.

The Finalised Structure Plan identifies a housing need for the Dunfermline and West Fife Area over the period 2006 to 2026 as 9,200 houses. However, land for 3,820 houses has already been identified and this leaves a shortfall of 5,380 houses. Of this shortfall, 4,550 houses are proposed in the Strategic Development Area to the south west/west/north of Dunfermline. Whilst some of the housing could be taken up by people coming to live in the area, the need takes account of the requirement to provide housing for local people.

Fife Council is required to ensure land for housing is brought forward via Structure and Local Plans. Fife Council's proposed strategy is to concentrate new greenfield land release in a number of planned extensions to existing settlements close to the public transport network and other services. This is the preferred approach.

The detailed identification of the development areas would be undertaken through the Dunfermline and West Fife Local Plan (DWFLP). Public consultation will be undertaken during this process.

Development cannot proceed in the absence of the necessary infrastructure and it is intended that this and the necessary amenities will be provided where and when required. Fife Council has been working with the various infrastructure and service providers in order to determine existing capacity and future requirements.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Wonders what is meant by the term Green Belt in the context of Fife Matters.

Response:

With regard to the Green Belt in the context of the Fife Structure Plan, Green Belt status is no longer viewed as what might be described as a "no go" area. The modern approach to Green Belts is more flexible and selected types of development are often permitted. A more up to date approach to Green Belts is to make sure new buildings are located in acceptable areas surrounded by land with Green Belt status. This assists in providing valuable protected open space. This Green Belt open space would provide land for recreation areas and paths through the built areas allowing people to walk or ride their bikes or horses to the countryside beyond. Fife Council is committed to working to provide more paths to allow greater access to the countryside and the paths through the new Green Belt would be linked to the network of paths beyond any new edge of Dunfermline.

Both the Approved Fife Structure Plan 2002 and the Finalised Structure Plan include a policy (Policy SS8 and Policy ENV1 respectively) supporting the designation of a Green Belt to the west and south west of Dunfermline. The boundary of the Dunfermline Green Belt will be delineated when the Dunfermline and West Fife Local Plan is drawn up. The Green Belt boundary will be drawn to make sure views to and from the historic town centre of Dunfermline are protected and make sure that there is enough land for any new building between 2006 and 2026.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

What alternatives were considered an what was the reason for their rejection?

Response:

The proposed strategy of a limited number of large scale greenfield sites is explained in a foregoing paragraphs re Report of Survey. The basis for the Finalised Structure Plan was approved by Fife Council's Policy and Resources Committee on 9th January 2003. The information is contained in the report entitled New Vision: A 20 Year Plan for Fife (2006-26) Strategic Choices for Sustainable Development. This paper can be viewed on the Fife website (Committee Meetings section).

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

What process is there to ensure that Fife Matters integrates with documents created by other councils?

Response:

Adjoining local authorities have been consulted on the contents of the Finalised Structure Plan during the Plan preparation process and they have been sent copies of the document. If concerns raised at the draft stage are not addressed to their satisfaction, adjoining local authorities have the right to submit comments and/or objections to the Scottish Ministers who will resolve any conflicts prior to approving the Plan.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

What is the process to ensure Fife Matters integrates with Scottish Executive plans and policies?

Response:

The Scottish Ministers will consider how the Finalised Structure Plan integrates with Scottish Executive Plans and Policies and will make any modifications they consider necessary to ensure consistency with them prior to approving it.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Please elaborate on the consultation process up to now and what is planned in the future. How does Fife Council ensure that all who will be affected will have their views recognised.

Response:

In the course of preparing the Finalised Structure Plan, its progress has been reported to Fife Council on a regular basis and the papers have been freely available in the public domain. There have also been regular features on the progress in the local press. Fife Council undertook a full public consultation over the period from 7th March 2005 to 2nd May 2005 including staging a series of public meetings in a number of Fife towns. Fife Council is required by law to demonstrate to the Scottish Ministers the steps it has taken to secure publicity for the Structure Plan. The details of the exercise are contained in this report which is being submitted as a supporting document with the Finalised Plan to the Scottish Ministers. This report will also contain details of the written comments about the Consultative Draft Structure Plan and Fife Council's responses to these comments. Once the Structure Plan has been submitted, there will be an opportunity to submit comments directly to the Scottish Ministers

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Please elaborate on the process for having discussion with landowners and explain why they merited individual discussions.

Response:

Landowners to whom you refer are those who have contacted Fife Council seeking to determine what forward planning proposals may or may not affect their land. Anyone seeking information on forward planning proposals for any area of interest may visit Development Services' offices to discuss forward planning matters.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

How does Fife Council guard against Fife Matters being manipulated by those who would gain financially?

Response:

The planning process is undertaken in an open and democratic manner. The contents of the Structure Plan, which is submitted to the Scottish Ministers for approval, are approved by elected members of Fife Council in open meetings. All Committee papers relating to the process are made available to all from three days in advance of meetings.

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

With regard to the increase in numbers of houses, what is going to be done to bring unoccupied properties into use? What consideration is given to the environmental impact of building new houses?

Response:

The number of unoccupied residential properties is taken into account when calculating the housing needs requirements. In addition Fife Council does encourage the re-use of suitable properties through refurbishment but their contribution to meeting housing needs is limited. In this instance, where there is a clear requirement for new buildings, the calculation of impacts on the environment of sourcing of building materials is not a determining factor.

Action:

No Change

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Understands there is a legal requirement to build houses according to a Scottish Executive formula. Concern about use of word formula, as variables are dependent on assumptions and assumptions can be manipulated.

Response:

The calculation of the housing land requirement is undertaken using methods which are consistent with Scottish Executive guidance as set out in SPP3 and PAN38. Prior to approving the Structure Plan, the Scottish Ministers will satisfy themselves that Fife Council has complied with the appropriate guidance.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

Who pays for new infrastructure?

Response:

The section on Developer Contributions in the Finalised Structure Plan Chapter 3 identifies how Fife Council is seeking to secure the provision of physical and social infrastructure.

Action:

No Change

Comment No: 13

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

How will market forces be taken into consideration through to 2026?

Response:

Policy M01 of the Finalised Structure Plan and supporting text make a clear commitment to monitoring the implementation of the Policies and proposals of the Structure Plan within five years of depositing the Plan with the Scottish Ministers.

This will ensure that changes in market forces and all other relevant factors are fully taken into account when the Plan is reviewed.

Action:

No Change

Comment No: 14

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

Given the failure of previous plans and proposals what gives Fife Council the confidence Fife Matters will be any more successful?

Response:

Your comments that previous plans and proposals have been a failure are not accepted. The Approved Fife Structure Plan set the way ahead for the period 2001-2011. The Finalised Structure Plan has been prepared following a rigorous and realistic appraisal of the likely requirements for the future and its policies and proposals should enable its successful implementation.

Action:

Moyes, P. - Dunfermline

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Draft Plan gives bias and priority to Kirkcaldy over Glenrothes.

Response:

Your suggestion that the Consultative Draft Structure Plan was biased and gave priority to Kirkcaldy over Glenrothes when both are of a similar size are noted. It is not considered that the Finalised Plan is based on any bias. Working towards boosting Kirkcaldy to regional centre status, with Glenrothes playing a supporting role, would ensure that neither suffer any detrimental effects from direct competition and that greater benefits accrue to Mid Fife and Fife as a whole. The decision to pursue this approach has been taken after a fulsome consideration of all available information and factors.

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Market Areas

Comment:

Considers Glenrothes area should be identified as a Housing Market Area (HMA) in its own right.

Response:

Fife Council has used methodology produced by Communities Scotland for defining Housing Market Areas. Previously Central Fife HMAs overlapped to an extent, shared common characteristics and were geographically adjacent to one another. This justifies a single HMA for Central Fife. A more detailed justification is set out in the Report of Survey.

Action:

No Change

Comment No: 11

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Pleased that a cross Forth Ferry service could be provided from Kirkcaldy to Leith.

Response:

Support noted.

Action:

Forrester, D - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Dunfermline

Comment:

Notes proposed development to west side of Dunfermline. Does Council not think Dunfermline is growing out of all proportion?

Response:

The Finalised Structure Plan identifies a housing need of 9,200 units for the Dunfermline and West Fife Area over the period 2006-2026. However, land for 3,820 houses has already been identified and this leaves a shortfall of 5,380 houses. Of this shortfall, 4,550 houses are proposed in the Strategic Development Area to the south west/west/north of Dunfermline from 2011 and 2026.

Fife Council is required to ensure that land for housing is brought forward via Structure and Local Plans. Fife Council's proposed strategy is to concentrate new greenfield land release in a number of planned extensions to existing settlements close to the public transport network and other services. This is the preferred approach

Dunfermline Strategic Development Area requires the detailed identification of the development areas to be undertaken through the Dunfermline and West Fife Local Plan (DWFLP). Public consultation will be undertaken during this process.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Leisure Facilities

Comment:

There has been no additional amenities developed since the start of the Eastern Development.

Response:

Land has been set aside in the Dunfermline Eastern Expansion Area for the provision of facilities that will be developed in due course. Fife Leisure Park has provided a modern multiplex cinema and other facilities are being developed. The Finalised Structure Plan seeks to ensure that new development in the Dunfermline Strategic Development Area will involve the necessary infrastructure, facilities, and amenities, to achieve a balanced development.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Road from Park Gates to Kincardine Road is not capable of handling lots of traffic. This road has a 17 tonne Environmental Weight Limit.

Response:

Comment noted.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

The road structure in Fife cannot sustain any further development. the tailbacks to the Forth Bridge are horrendous with commuters going to Edinburgh.

Response:

Fife Council is working towards addressing the current peak time congestion problems through a series of initiatives including the provision of Park & Ride facilities and railway platform lengthening. Further planned works are set out in Proposal PT1 of the Finalised Structure Plan (Draft Plan Proposal PT2) and in the Local Transport Strategy.

Action:

Murray, Janet - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Road system serving western Dunfermline is guite restricted.

Kincardine road has heavy usage.

Response:

Noted. The Dunfermline and West Fife Local Plan and Dunfermline Strategic Development Area (SDA) masterplan will identify in detail the transport improvements required to deliver development. The Finalised Structure Plan Action Plan also lists key strategic transport proposals and required infrastructure to deliver the SDA.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Forth Road Bridge has high volumes of traffic both morning and evening. Adding more traffic is ill advised.

Response:

Concerns noted. Fife Council is working towards addressing the current peak time congestion problems through a series of initiatives as described in the Local Transport Strategy and Area Transport Plan. The Finalised Structure Plan seeks to reduce the amount of new housing at the Forth bridgehead and to avoid bringing this forward at the early stage of the Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Schools in west Dunfermline are mostly housed in old buildings which are difficult to extend. Extra children would cause overcrowding and associated problems.

Response:

Fife Council is aware of the situation with regards to education and the appropriate Services have been liaising to identify the level of provision required to service any proposed new development. The Finalised Structure Plan identifies the needs for education in general terms in Policy DC2 of Draft Plan and this would be delivered, via developer contributions and other mechanisms, when necessary. Fife Council is currently undertaking an assessment of the provision of education facilities which is intended to improve the delivery of education services. This will take account of housing land allocations within the Development Plan. Details of the Shaping Future Schools for Fife exercise are available on www.fifedirect.org.uk or from Fife Council Education Service.

Action:

No Change. Policy DC2 of Draft Plan now revised as Proposal DC1 of Finalised Plan.

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Wonders where new occupants of houses would find work. If they are commuters to Edinburgh, Stirling, Glasgow or Kirkcaldy this would result in an increase in traffic.

Response:

The Finalised Structure Plan, through identifying Strategic Development Areas and Other Strategic Land Allocations, seeks to ensure that development is located in the most sustainable locations and delivers mixed development with housing and employment opportunities. The Plan also supports improvements to the transport network and public transport to minimise the impact of new development and encourage modal shift.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

Unlikely extra residents would arrive without adding to existing health care facilities.

Response:

Fife Council's services are working together with their partner organisations, including the health care providers, to ensure that all necessary new facilities and services would be brought forward when required. NHS Fife is aware of the proposals for growing Fife's population 2006-26.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Leisure Facilities

Comment:

Concerned about the lack of capacity of leisure facilities to cater for more residents.

Response:

In relation to the funding of new facilities the Finalised Structure Plan seeks to ensure that they will be provided through developer contributions where this would be appropriate. The identification of any specific areas required for future development will be done taking full account of the need for physical and other forms of recreation. This exercise will be part of the Local Plan preparation process.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Additional housing means additional facilities and the cost of providing these would prohibit anyone moving in.

Considers the development is a massive explosion of houses will stretch facilities and no one will enjoy living there.

Response:

The proposed 4,550 houses would be developed over the period from 2011 to 2026, which is an average build rate of 300 houses per annum, which is less than that achieved in recent years. Strategic housing allocations have been given further consideration in finalising the Plan.

Action:

Barker, Thomas - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Why are Fife Council seeking to build houses on a Green Belt.

Response:

There is currently no designated Green Belt. Both the Approved Fife Structure Plan 2002 and the Finalised Structure Plan both include a policy (PolicySS8 and Policy ENV1 respectively) supporting the designation of a Green Belt to the west and south west of Dunfermline. The delineation of the boundary of the Dunfermline Green Belt will be undertaken as part of the preparation of the DWFLP taking account of the need to protect views to and from the historic core including the Abbey, Palace and City Chambers and any future land requirements.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Green Belt is protected land and no-one can build on it.

Response:

At one time Green Belt land was generally treated as a "no-go area" for development. However, the modern approach is more flexible and selected types of development are permitted. An even more up to date approach to planning Green Belts is to ensure new buildings are located in acceptable areas surrounded by land with Green Belt status.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

The Green Belt is where Dunfermline rugby team practise and play matches.

Response:

It is assumed that the area referred to is McKane Park. This area is not Green Belt. The area is allocated for open space in the Adopted Dunfermline and the Coast Local Plan. The future of McKane Park and the area to the west will be considered during the preparation of the Dunfermline and West Fife Local Plan in the context of any proposals to develop the area south west/west/north of Dunfermline. The need for recreational open space will be calculated and land identified for this purpose when the Local Plan is prepared.

Action:

McLean, Colin - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Dunfermline

Comment:

Concerned about the proposal to create four and a half thousand new houses in the west Dunfermline area.

Response:

The Finalised Structure Plan identifies a housing need for the Dunfermline and West Fife Area over the period 2006 to 2026 as 9,200 houses. However land for 3,820 houses has already been identified and this leaves a shortfall of 5,380 houses. Of this shortfall 4,550 houses would be in the Strategic Development Area to the south west/west/north of Dunfermline.

Fife Council is required to ensure land for housing brought forward via Structure and Local Plans. Fife Council's strategy is to concentrate new greenfield land release in a small number of planned extensions to existing settlements close to the public transport network and other services. This is the preferred approach.

Dunfermline Strategic Development Area will require the detailed identification of the development areas to be undertaken through the Dunfermline and West Fife Local Plan (DWFLP). Public consultation will be undertaken during this process.

Action:

No Change.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Concerned about the ongoing development in the Dunfermline Eastern Expansion Area, especially the lack of community facilities.

Response:

Comments noted. The masterplan for this area allocates land for the purposes you mention and the facilities will be developed by the appropriate agencies in due course. The Finalised Structure Plan is proposing a more positive approach to the provision of infrastructure and facilities as set out in the section dealing with Developer Contributions in Chapter Three.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

Concerned about the lack of hospital facilities in the Dunfermline area with particular reference to the level of service provided by the Queen Margaret Hospital.

Response:

The level of service provided by Queen Margaret Hospital is not a land use planning issue and cannot be addressed in the Finalised Structure Plan.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Concerned that the roads in the west of Dunfermline are having difficulty in coping with current traffic and would be inadequate for additional housing.

Response:

As well as encouraging development in locations that increase accessibility to homes, employment and services, the Local Planning and Masterplanning process would guide development away from locations where traffic generated by the development would not adversely impact on local communities. Traffic issues would be addressed in order to ensure that any new development is properly serviced in order to prevent the problems suggested in your letter.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Concerned that much of the traffic would be commuter traffic as new housing likely to be a dormitory settlement for Edinburgh.

Response:

The Finalised Structure Plan, through identifying Strategic Development Areas and Other Strategic Land Allocations, seeks to ensure that development is located in the most sustainable locations and delivers mixed development with housing and employment opportunities. The Plan also supports improvements to the transport network and public transport to minimise the impact of new development and encourage modal shift.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

West side of Dunfermline city is the home to many of the important features such as the Abbey, City Chambers, Pittencrieff Park and the Glen.

Response:

The identification of specific areas which may be required for development will be made taking full account of the nature conservation and landscape issues in order to ensure that any new development is fully integrated into its surroundings. The Approved Fife Structure Plan and the Finalised Structure Plan both make the commitment to identifying a Green Belt for the land to the south and west of Dunfermline (Policy SS8 and Policy ENV1 respectively). The Green Belt will be designated as part of the process of preparing the Dunfermline and West Fife Local Plan taking account of the views to and from the historic core of Dunfermline taking account of any future land requirements.

Action:

Barker, Mike - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Dunfermline

Comment:

Protests against the proposed Dunfermline Western Expansion

Response:

The Finalised Structure Plan identifies a housing need for the Dunfermline and West Fife Area over the period 2006 to 2026 as 9,200 houses. However land for 3,820 houses has already been identified and this leaves a shortfall of 5,380 houses. Of this shortfall 4,550 houses would be in the Strategic Development Area to the south west/west/north of Dunfermline.

Fife Council is required to ensure land for housing brought forward via Structure and Local Plans. Fife Council's strategy is to concentrate new greenfield land release in a small number of planned extensions to existing settlements close to the public transport network and other services. This is the preferred approach.

Dunfermline Strategic Development Area requires the detailed identification of the development areas to be undertaken through the Dunfermline and West Fife Local Plan (DWFLP). Public consultation will be undertaken during this process.

Action:

Lawson, Elizabeth - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Dunfermline

Comment:

Concerned the proposals for Dunfermline are not based on logic, statistics or reality and will create more problems for the area.

Response:

Concerns noted. The Finalised Structure Plan identifies a housing need for the Dunfermline and West Fife Area over the period 2006 to 2026 as 9,200 houses. However land for 3,820 houses has already been identified and this leaves a shortfall of 5,380 houses. Of this shortfall 4,550 houses would be in the Strategic Development Area to the south west/west/north of Dunfermline.

Fife Council is required to ensure land for housing brought forward via Structure and Local Plans. Fife Council's strategy is to concentrate new greenfield land release in a small number of planned extensions to existing settlements close to the public transport network and other services. This is the preferred approach.

Dunfermline Strategic Development Area proposal requires the detailed identification of the development areas to be undertaken through the Dunfermline and West Fife Local Plan (DWFLP). Public consultation will be undertaken during this process.

The evaluation of the land requirements for the Structure Plan period to 2026 has been based on a number of factors which are clearly explained in the Fife Council background paper entitled the Report of Survey.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Fife Council does not seem to have researched what has proven good economic practice in other historic towns in the UK. The centre is not usually geographically at the centre and is often surrounded by natural features such as rivers to allow for relaxed shopping. The council is keen to develop tourism but is planning to destroy one of its major attractions. Other historic towns project their character to add to the shopping experience.

Response:

Fife Council is committed to ensuring that its town centres prosper in the future yet at the same time ensuring that they are carefully managed to retain their distinctive sense of place and character. The Finalised Structure Plan is committed to addressing economic matters whilst ensuring that the design of any new development will be of the highest quality. Whilst not addressed in the Finalised Structure Plan, conservation policies currently contained in the approved Structure Plan and adopted Local Plans will be replaced by the conservation policies in the emerging Local Plans. Development of Dunfermline town centre will take into account and utilise its important cultural heritage.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

In other centres frontages have to be retained, multiples are kept out and more interesting shops encouraged. Huge superstores and clubs should be kept out of from the city centre.

Response:

Comments noted. The details of Dunfermline Town Centre's future appearance and function will be the subject of public debate during the preparation of the DWFLP and any subsequent masterplan preparation exercises.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Does Dunfermline require another 4,550 houses as many of the residents who have moved in commute to Edinburgh increasing traffic problems?

Response:

As explained in Chapter One of the Finalised Structure Plan, Fife Council considers that there is an opportunity to obtain a number of benefits attracting new housing development which will provide housing for both local people and people moving into Fife from Edinburgh and elsewhere. These benefits include the regeneration of a number of areas of Fife and creating employment opportunities. The proposed new housing including that in the Dunfermline Strategic Development Area is not totally commuter led as you suggest. An element of the housing land provision is required to meet forecast local needs for the 20-year plan period.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Infrastructure

Comment:

Concerned about the ability of education and health services in Dunfermline to cope with the additional 4,550 houses.

Response:

Fife Council is aware of the situation with regards to education and the appropriate Services have been liaising to identify the level of provision required to meet the proposed new development. The Finalised Structure Plan identifies the needs for education in general terms in Policy DC1 and this would be delivered, via developer contributions and other mechanisms, when necessary. Fife Council is currently addressing future educational needs via the Schools Estates Strategy exercise and school places will be provided timeously. This will take account of housing land allocations within the Development Plan. The provision of all other necessary infrastructure will be secured in advance of any new development.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Fife Council seems unwilling to listen to Fife residents and those who fund its activities.

Response:

Fife Council undertook an extensive consultation exercise on the proposals set out in the Draft Structure Plan and in Finalising the Plan has considered all comments received. These will not always result in a change to the Plan. Once the Finalised Structure Plan has been submitted to the Scottish Ministers for approval, there is a further opportunity to submit comments and/or objections directly to them. The Scottish Ministers will then either approve or set aside Fife Council's proposals prior to approving the Plan.

Action:

Jones, W - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Dunfermline

Comment:

Concerned about proposed western extension to the west of Dunfermline, involving over 4,000 probably expensive houses.

Response:

Concern noted. The Finalised Structure Plan identifies a housing need for the Dunfermline and West Fife Area over the period 2006 to 2026 as 9,200 houses. However land for 3,820 houses has already been identified and this leaves a shortfall of 5,380 houses. Of this shortfall 4,550 houses would be in the Strategic Development Area to the south west/west/north of Dunfermline.

Fife Council is required to ensure land for housing brought forward via Structure and Local Plans. Fife Council's strategy is to concentrate new greenfield land release in a small number of planned extensions to existing settlements close to the public transport network and other services. This is the preferred approach.

Dunfermline Strategic Development Area proposal requires the detailed identification of the development areas to be undertaken through the Dunfermline and West Fife Local Plan (DWFLP). Public consultation will be undertaken during this process.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Does Fife need to attract more and more residents from Edinburgh?

Response:

As explained in Chapter One of the Finalised Structure Plan, Fife Council considers that there is an opportunity to obtain a number of benefits attracting new housing development which will provide houses for both local people and people moving into Fife from Edinburgh and elsewhere. These benefits include the regeneration of a number of areas of Fife and creating employment opportunities. The proposed new housing including that in the Dunfermline Strategic Development Area is not totally commuter led as you suggest. An element of the housing land provision is required to meet forecast local needs for the 20-year plan period.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Concerned about impact of new development on traffic and other services such as schools and medical services.

Response:

The Dunfermline and West Fife Local Plan and masterplan for the Dunfermline Strategic Development Area (SDA) will identify the detail of sites and infrastructure required, as listed in Finalised Plan Proposal DC1. The Finalised Structure Plan Action Plan lists required infrastructure for the SDAs and will be subject to biennial review.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Housing should not have been permitted south of the Lyne Burn. What remains of Dunfermline Green Belt should be cherished as an asset for future generations.

Response:

There is currently no designated Green Belt. Both the Approved Fife Structure Plan 2002 and the Finalised Structure Plan both include a policy (Policy SS8 and Policy ENV1 respectively) supporting the designation of a Green Belt to the west and south west of Dunfermline. The delineation of the boundary of the Dunfermline Green Belt will be undertaken as part of the preparation of the DWFLP taking account of the need to protect views to and from the historic core including the Abbey, Palace and City Chambers and any future land requirements.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Fife Council should take a firm stance now to repel all sorts of approaches from opportunistic developers.

Response:

The approach taken by Fife Council to plan for the future should ensure that sufficient land will be available to meet the planned needs of Fife. Under the current planning system the Development Plan led approach is designed to prevent development by what you describe as "opportunistic developers." The Development Plan led approach will ensure that any new development makes a positive, planned, contribution to Fife.

Action:

Gordon, Andrew - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Dunfermline

Comment:

Objects to the proposed western extension to the west of Dunfermline.

Response:

Objection noted. The Finalised Structure Plan identifies a housing need for the Dunfermline and West Fife Area over the period 2006-2026 as 9,200 houses. However land for 3,820 houses has already been identified and this leaves a shortfall of 5,380 houses. Of this shortfall 4,550 houses would be in the Strategic Development Area to the south west/west/north of Dunfermline.

Fife Council is required to ensure land for housing brought forward via Structure and Local Plans. Fife Council's strategy is to concentrate new greenfield land release in a small number of planned extensions to existing settlements close to the public transport network and other services. This is the preferred approach.

Dunfermline Strategic Development Area proposal requires the detailed identification of the development areas to be undertaken through the Dunfermline and West Fife Local Plan (DWFLP). Public consultation will be undertaken during this process.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Consider that road infrastructure on western side of Dunfermline is not equipped to cope with increased traffic.

Response:

The Dunfermline and West Fife Local Plan and masterplan for the Dunfermline Strategic Development Area (SDA) will identify the detail of sites and infrastructure required, as listed in Finalised Plan Proposal DC1. The Finalised Structure Plan Action Plan lists required infrastructure for the SDAs and will be subject to biennial review.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Concerned about the impact of additional housing on provision of education and medical facilities.

Response:

Fife Council is aware of the education situation and appropriate Services have been liaising to identify provision required. The Finalised Structure Plan address education needs and identifies methods for delivery where necessary. Fife Council is currently undertaking an assessment of the provision of education services in the future via the School Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. Details of the Shaping Future Schools for Fife exercise are available on the Fife web site (www.fifedirect.org.uk) or from Fife Council Education Service.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Concerned that the expansion area would become a dormitory for those working in Edinburgh and would not contribute anything to city of Dunfermline.

Response:

Any new development to the south west / west / north of Dunfermline would be within easy reach of Dunfermline Town Centre and in easy reach of public transport facilities. It is considered development in this area would have a positive effect.

Action:

Kyle, Sarah - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Dunfermline

Comment:

Concerned about the planned western expansion to Dunfermline.

Response:

Concerns noted. The Finalised Structure Plan identifies a housing need for the Dunfermline and West Fife Area over the period 2006 to 2026 as 9,200 houses. However land for 3,820 houses has already been identified and this leaves a shortfall of 5,380 houses. Of this shortfall 4,550 houses would be in the Strategic Development Area to the south west/west/north of Dunfermline.

Fife Council is required to ensure land for housing brought forward via Structure and Local Plans. Fife Council's strategy is to concentrate new greenfield land release in a small number of planned extensions to existing settlements close to the public transport network and other services. This is the preferred approach.

Dunfermline Strategic Development Area proposal requires the detailed identification of the development areas to be undertaken through the Dunfermline and West Fife Local Plan (DWFLP). Public consultation will be undertaken during this process.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Concerned about increased traffic on Forth Street and Limekilns Road. Consider that road infrastructure on western side of Dunfermline is not equipped to cope with increased traffic.

Response:

The Dunfermline and West Fife Local Plan and masterplan for the Dunfermline Strategic Development Area (SDA) will identify the detail of sites and infrastructure required, as listed in Finalised Plan Proposal DC1. The Finalised Structure Plan Action Plan lists required infrastructure for the SDAs and will be subject to biennial review.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

Concerned about the impact of additional housing on medical facilities.

Response:

Fife Council's services are working together with their partner organisations, including the health care supporting infrastructure, would be brought forward when required. NHS Fife is aware of the proposals for growing Fife's population 2006-26.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Concerned about the impact of additional housing on provision of education.

Response:

Fife Council is aware of the education situation and appropriate Services have been liaising to identify provision required. The Finalised Structure Plan addresses education needs and identifies methods for delivery where necessary. Fife Council is currently undertaking an assessment of the provision of education services in the future. This will take account of housing land allocations within the Development Plan. Details of the Shaping Future Schools for Fife exercise are available on the Fife web site or from Fife Council Education Service.

Action:

Harmack, H - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Objects to an additional 4,550 houses Dunfermline.

Response:

Objection noted. The Finalised Structure Plan identifies a housing need for the Dunfermline and West Fife Area over the period 2006 to 2026 as 9,200 houses. However land for 3,820 houses has already been identified and this leaves a shortfall of 5,380 houses. Of this shortfall 4,550 houses would be in the Strategic Development Area to the south west/west/north of Dunfermline.

Fife Council is required to ensure land for housing brought forward via Structure and Local Plans. Fife Council's strategy is to concentrate new greenfield land release in a small number of planned extensions to existing settlements close to the public transport network and other services. This is the preferred approach.

The detailed identification of the development areas would be undertaken through the Dunfermline and West Fife Local Plan (DWFLP). Public consultation will be undertaken during this process.

The detailed allocation of land will include provision for a Green Belt and this will be delineated as part of the DWFLP preparation process. This will ensure that the views of the historic core of Dunfermline are protected and that new development fits into the landscape and is fully integrated into adjacent areas.

Action:

Kingshott, M - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Dunfermline

Comment:

Concerned about proposals to build 4,550 houses in West Dunfermline. Dunfermline is large enough.

Response:

Concerns noted. The Finalised Structure Plan identifies a housing need for the Dunfermline and West Fife Area over the period 2006 to 2026 as 9,200 houses. However land for 3,820 houses has already been identified and this leaves a shortfall of 5,380 houses. Of this shortfall 4,550 houses would be in the Strategic Development Area to the south west/west/north of Dunfermline.

Fife Council is required to ensure land for housing brought forward via Structure and Local Plans. Fife Council's strategy is to concentrate new greenfield land release in a small number of planned extensions to existing settlements close to the public transport network and other services. This is the preferred approach.

Dunfermline Strategic Development Area proposal requires the detailed identification of the development areas would to be undertaken through the Dunfermline and West Fife Local Plan (DWFLP). Public consultation will be undertaken during this process.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

Concerned about the future provision of health care facilities. Unwise to shift services from Queen Margaret Hospital Dunfermline to Victoria Hospital in Kirkcaldy.

Response:

Concerns about the provision of health are noted however, the health care providers are aware of the location and scale of development proposed in the Finalised Structure Plan. Specific service provision issues as mentioned are not a planning issue.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Concerned about the future provision of schooling.

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Concerned about the roads infrastructure and the Forth Bridge traffic. How will this cope with additional traffic?

Response:

The Dunfermline and West Fife Local Plan and masterplan for the Dunfermline Strategic Development Area (SDA) will identify the detail of sites and infrastructure required, as listed in Finalised Plan Proposal DC1. The Finalised Structure Plan Action Plan lists required infrastructure for the SDAs and will be subject to biennial review.

The Finalised Structure Plan supports the provision of an additional multi-modal Forth crossing at Queensferry as a key strategic transport proposal for Fife and for eastern Scotland. Studies are ongoing through the Scottish Executive and Regional Transport Partnership to evaluate options and the Finalised Structure Plan must reflect this position. The housing land requirement and proposed strategic development allocations seek to meet housing needs and support economic development in Fife over the next 20 years, giving full consideration to the potential traffic impacts. The Report of Survey describes the transport modelling work carried out in support of the strategy.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

Concerned that additional development would result in additional housing and traffic which would spoil Pittencrieff Park.

Response:

Comments noted re Pittencrieff Park. There is currently no designated Green Belt in the Dunfermline area. However, the approved Fife Structure Plan 2002 and the Finalised Structure Plan both include a policy (Policy SS8 and ENV1 respectively) supporting the designation of a Green Belt to the west and south west of Dunfermline to protect views to and from the historic core. The delineation of the boundary of the Dunfermline Green Belt will be undertaken as part of the preparation of the Dunfermline and West Fife Local Plan taking account of the landscape issues and any future land requirements.

Action:

Bisset, Pauline - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Dunfermline

Comment:

Objects to proposals for 4,550 houses to be built west of Dunfermline.

Response:

Objection noted. The Finalised Structure Plan identifies a housing need for the Dunfermline and West Fife Area over the period 2006 to 2026 as 9,200 houses. However land for 3,820 houses has already been identified and this leaves a shortfall of 5,380 houses. Of this shortfall 4,550 houses would be in the Strategic Development Area to the south west/west/north of Dunfermline.

Fife Council is required to ensure land for housing brought forward via Structure and Local Plans. Fife Council's strategy is to concentrate new greenfield land release in a small number of planned extensions to existing settlements close to the public transport network and other services. This is the preferred approach.

Dunfermline Strategic Development Area proposal requires the detailed identification of the development areas to be undertaken through the Dunfermline and West Fife Local Plan (DWFLP). Public consultation will be undertaken during this process.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

Concerned about building on greenfield area of Dunfermline. Housing would destroy the area's natural attractiveness.

Response:

Assume reference to greenfield areas refers to Green Belt. Fife Council is committed to identifying a Green Belt on the western edge of Dunfermline which will be delineated as part of the preparation of Dunfermline and West Fife Local Plan. This process would take full account of nature conservation and landscape issues including the views to and from Dunfermline Abbey and the historic core and any land required for new development.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Concerned about increased traffic on Limekilns Road and increase in traffic in general. Forth Road Bridge is always congested.

Response:

The Dunfermline and West Fife Local Plan and masterplan for the Dunfermline Strategic Development Area (SDA) will identify the detail of sites and infrastructure required, as listed in Finalised Plan Proposal DC1. The Finalised Structure Plan Action Plan lists required infrastructure for the SDAs and will be subject to biennial review.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

Concerned about the provision of health care and other services, especially in respect of the anticipated population increase.

Response:

Fife Council's services are working together with their partner organisations, including the health care providers, to ensure that all necessary new facilities and services, including supporting infrastructure, would be brought forward when required. In addition Fife Council is aware of the situation with regards to education and the appropriate Services have been liaising to identify the level of provision required to meet the proposed new development.

Action:

Hirst, L - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Supports aim of providing affordable housing, where it does not intrude into greenfield sites.

Response:

Due to the scale of the affordable housing shortage in Fife i.e. 4,958 units (Housing Needs and Affordability Study) not all of this can be provided on brownfield land. However the Council's priority is to use brownfield land in preference to greenfield land.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Houses in Multiple Occupancy

Comment:

Concerns about houses in multiple occupancy. University has enough land and property to provide further accommodation, thus releasing more properties in the town. Suggests ceiling on housing to be sold to anyone other than locals.

Response:

Concern noted. It is acknowledged that this is an important local issue. However as the Structure Plan is a strategic document, this matter is more appropriately addressed by the Local Plan process, especially the St Andrews and East Fife Local Plan. The Council is liaising with the University.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Large-scale development will put further strain on sewerage and cause flooding in the area.

Response:

It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Cunningham, Adam - Glenrothes

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The Plan states that there are 2,500 homes to be built in the Glenrothes area - how many of these will be affordable - not very many? Glenrothes has huge building projects but they are all private and in no way affordable. There is a shortage of affordable housing in Glenrothes.

Response:

It is agreed that there is a shortage of affordable housing in Glenrothes. The updated Housing Needs and Affordability Study identifies that there is a shortage of just under 1,000 affordable houses in the Kirkcaldy housing market area, in which Glenrothes is located. A percentage requirement of 10% for the Glenrothes area has been set out in the Finalised Fife Structure Plan.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Fife Council and its public sector partners have a duty and responsibility to provide housing which is affordable.

Response:

This is not a land use planning issue. Apart from a statutory duty in terms of homelessness, the Council's role is limited to an enabling function.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

How many 20 Year Plans have there to be before something actually gets done? Previous Plans are practically identical and go over the same ground but offer only vague solutions.

Response:

Structure Plans by their nature set the strategic planning scene rather than provide the detail and solutions that emerge via the ordnance map based Local Plans.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Has written to the Scottish Executive and received response referring to increased investment and a greater level of interest by the Executive, but this amounts to nothing. No-one is taking control of the problem.

Response:

Fife Council is actively developing a broad range of measures to address the need for affordable housing. The land use planning system will be used to secure a valuable contribution although it cannot meet the shortfall in entirety.

Action:

Chalmers, John - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Dunfermline

Comment:

Concerned about proposals to build another 4,550 houses in Dunfermline West.

Response:

Objection to the number of houses proposed to be built in the Dunfermline area is noted. The Finalised Structure Plan identifies a housing need for the Dunfermline and West Fife Area over the period 2006 to 2026 as 9,200 houses. However land for 3,820 houses has already been identified and this leaves a shortfall of 5,380 houses. Of this shortfall 4,550 houses would be in the Strategic Development Area to the south west/west/north of Dunfermline.

Fife Council is required to ensure land for housing brought forward via Structure and Local Plans. Fife Council's strategy is to concentrate new greenfield land release in a small number of planned extensions to existing settlements close to the public transport network and other services. This is the preferred approach.

Dunfermline Strategic Development Area proposal requires the detailed identification of the development areas to be undertaken through the Dunfermline and West Fife Local Plan (DWFLP). Public consultation will be undertaken during this process.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Concerned about the current transport links with Edinburgh and the potential impact of any additional housing. Transport improvement must come before new housing.

Response:

The Finalised Structure Plan supports the provision of an additional multi-modal Forth crossing at Queensferry as a key strategic transport proposal for Fife and for eastern Scotland. Studies are ongoing through the Scottish Executive and Regional Transport Partnership to evaluate options and the Finalised Structure Plan must reflect this position. The housing land requirement and proposed strategic development allocations seek to meet housing needs and support economic development in Fife over the next 20 years, giving full consideration to the potential traffic impacts. The Report of Survey describes the transport modelling work carried out in support of the strategy.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Concerned about increased levels of local traffic on existing road network.

Response:

The Dunfermline and West Fife Local Plan and masterplan for the Dunfermline Strategic Development Area (SDA) will identify the detail of sites and infrastructure required, as listed in Finalised Plan Proposal DC1. The Finalised Structure Plan Action Plan lists required infrastructure for the SDAs and will be subject to biennial review.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Concerned about amount of heavy goods using Limekilns Road ignoring weight restriction on bridge at Liggars Place.

Response:

This is not a strategic planning issue. Copied to Fife Council Transportation Services.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

Concerned about the provision of health care, education and other services, especially in respect of the anticipated population increase of between 15,000 and 20,000.

Response:

Fife Council's services are working together with their partner organisations, including the health care providers, to ensure that all necessary new facilities and services, including supporting infrastructure, would be brought forward when required. In addition Fife Council is aware of the situation with regards to education and the appropriate Services have been liaising to identify the level of provision required to meet the proposed new development.

The comments in the previous paragraph in relation to service provision in Dunfermline being provided when needed applies to all of the areas where development is proposed in the Finalised Structure Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Leisure Facilities

Comment:

Concerned about possibility of the development of McKane Park and impact on recreational facilities.

Response:

McKane Park is allocated for Open Space in the Adopted Dunfermline and the Coast Local Plan. The Dunfermline Strategic Development Area option is being pursued and the future of McKane Park and the area to the west will be considered during the preparation of the Dunfermline and West Fife Local Plan. The issue of recreational and open space requirements is important and will be fully addressed as part of the preparation of the Dunfermline and West Fife Local Plan. The Structure Plan is not site specific.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Unable to obtain car parking at Queen Margaret Hospital on a number of recent visits.

Response:

This is not a strategic planning issue and will be addressed through the Area Transport Plan.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

West Dunfermline needs an improved Community/Sports facility.

Response:

This is an issue to be addressed via the Area Local Plan, Master Plans and development briefs.

Action:

Major, R - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Considers much of Fife Matters has merit and ambitions for Fife but concerns about proposals for West Fife.

Response:

Noted. *Action:*

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Concerned Fife is supporting Scottish Executive's approach to addressing problems of overheating Edinburgh economy resulting in more commuters. Developers prefer greenfield sites in Fife to brownfield sites in Lothians.

Response:

The Finalised Structure Plan must take account of National Policy including the contents of the National Planning Framework for Scotland (NPF) published by the Scottish Executive in 2004. The NPF identifies West Edinburgh / South Fife as a Key Economic Development Zone and Fife is part of the Aberdeen / Edinburgh / Newcastle corridor. Fife Council considers there are benefits to be obtained by attracting new housing, providing both for local needs and people from Edinburgh, such as regenerating many areas of Fife and creating new employment opportunities.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Dunfermline

Comment:

Concerned that current level of services could not sustain new development.

Response:

Fife Council's services are working together with their partner organisations including the health care providers to ensure that any necessary new facilities and services would be brought forward when required. Fife Council is aware of the education situation and appropriate Services have been liaising to identify provision required. The Finalised Structure Plan addresses education needs and identifies methods for delivery where necessary. Traffic issues, would be addressed to ensure any new development is properly serviced to and action would be taken to prevent any roads becoming congested.

With specific reference to traffic issues, ongoing works in Fife, for example the Ferry Toll Park and Ride development plus railway station platform extensions are working to increase accessibility to cross Forth public transport services thereby reducing traffic congestion. The Finalised Structure Plan sets out a number of proposals that, when implemented, will make further significant contribution to ease the transport situation.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Brownfield Land

Comment:

Development should be restricted as much as possible to brownfield sites.

Response:

Whilst the Finalised Structure Plan strongly promotes the use of brownfield sites they cannot meet all the anticipated land requirements for the Structure Plan period.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Leisure Facilities

Comment:

Concerned about potential effect on Pittencrieff Park, the area around the station and McKane Park

Response:

Pittencrieff Park is identified as a Garden and Designed Landscape which is a protected status. McKane Park is allocated for Open Space in the Adopted Dunfermline and the Coast Local Plan. The future of McKane Park and the area to the west will be considered during the preparation of the Dunfermline and West Fife Local Plan. The issue of recreational and open space requirements is important and will be fully addressed as part of the preparation of the Dunfermline and West Fife Local Plan. The Structure Plan is not site specific.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

To sustain Dunfermline's attractiveness there is a need to maintain attractive green field sites in vicinity of the city centre and to add to historic heritage. Invest in city centre.

Response:

Fife Council is committed to identifying a Green Belt on the western edge of Dunfermline which will be delineated as part of the preparation of Dunfermline and West Fife Local Plan. This process would take full account of nature conservation and landscape issues including the views to and from Dunfermline Abbey and the historic core and any land required for new development.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Suggests pace of housing development in Fife should be linked to economic development rate.

Response:

See response to ID 0554 comment No. 02 re relationship with Edinburgh economy and the strategy of the Finalised Structure Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

Ironic that the empty Motorola site overlooks Dunfermline Eastern Expansion housing area.

Response:

Comments re Motorola (now named Freescale) site are noted. The property remains available for development for a range of uses and should be viewed as a positive asset for future employment creation.

Action:

No Change

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Leisure Facilities

Comment:

Considers sporting and other recreational facilities should be in the centre of town.

Response:

The issue of any new sporting and recreational facilities will be fully considered as part of the preparation of the Local Plan preparation process.

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Considers link between new housing and economic development could offer more in Mid Fife than in West Fife

Response:

The Strategy of the Finalised Structure Plan seeks to strengthen the link between new housing in Mid Fife however the needs in West Fife must also be addressed.

Action:

Harris, Claire - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Dunfermline

Comment:

Concerned about the possibility of 4,550 houses being built to the west of Dunfermline.

Response:

Concerns about the number of houses proposed to be built in the Dunfermline area are noted. The Finalised Structure Plan identifies a housing need for the Dunfermline and West Fife Area over the period 2006 to 2026 as 9,200 houses. However land for 3,820 houses has already been identified and this leaves a shortfall of 5,380 houses. Of this shortfall 4,550 houses would be in the Strategic Development Area to the south west/west/north of Dunfermline.

Fife Council is required to ensure land for housing brought forward via Structure and Local Plans. Fife Council's strategy is to concentrate new greenfield land release in a small number of planned extensions to existing settlements close to the public transport network and other services. This is the preferred approach.

Dunfermline Strategic Development Area proposal requires the detailed identification of the development areas to be undertaken through the Dunfermline and West Fife Local Plan (DWFLP). Public consultation will be undertaken during this process.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

Concerned about the impact of new development on the peace and quiet of West Dunfermline. Views from Pittencrieff Park would be affected detrimentally.

Response:

The identification of areas to be developed will take full account of nature conservation and landscape issues, including the views to and from Dunfermline Abbey and the Glen. Fife Council is committed to identifying a Green Belt on the western edge of Dunfermline which will be delineated as part of the preparation of the Dunfermline and West Fife Local Plan and will take account of these matters.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

Does not understand why land is required as Bellway Homes is failing to sell houses built on eastern expansion area and is now pulling out of area.

Response:

Fife Council as Planning Authority is required to ensure that land for housing is brought forward through the Development Plan (the Structure Plan and Local Plans). The Structure Plan Report of Survey explains how the requirements are derived. Housing completions and housing land supply are monitored annually through the Housing Land Review. Variations in developer activity in any one area not uncommon and one developer moving on does not imply any change in the longer-term strategy.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

Concerned about possible impact on healthcare facilities.

Response:

Fife Council's services are working together with their partner organisations including the health care providers to ensure that all necessary new facilities and services would be brought forward when required.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Concerned about possible impact on education services

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Concerned about impact of traffic on approach from the South i.e. Limekilns Road.

Response:

The Dunfermline and West Fife Local Plan and masterplan for the Dunfermline Strategic Development Area (SDA) will identify the detail of sites and infrastructure required, as listed in Finalised Plan Proposal DC1. The Finalised Structure Plan Action Plan lists required transport and other infrastructure for the SDAs and will be subject to biennial review.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

There is no need for this amount of new housing in Dunfermline.

Response:

The Finalised Plan sets a requirement for housing in Dunfermline to meet need in the area for the period 2006 - 2026. The identification of land will be undertaken as part of preparing Dunfermline and West Fife Local Plan. A range of factors to be considered are set out in Policy SS1 of the Finalised Structure Plan. In addition other relevant National and Fife Council policies will be fully taken into account.

Action:

Watret, D - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Dunfermline

Comment:

Object to the number of houses proposed.

Response:

Objection to the number of houses proposed to be built in the Dunfermline area are noted. The Finalised Structure Plan identifies a housing need for the Dunfermline and West Fife Area over the period 2006 to 2026 as 9,200 houses. However land for 3,820 houses has already been identified and this leaves a shortfall of 5,380 houses. Of this shortfall 4,550 houses would be in the Strategic Development Area to the south west/west/north of Dunfermline.

Fife Council is required to ensure that land for housing is brought forward via Structure and Local Plans. Fife Council's strategy is to concentrate new greenfield land release in a small number of planned extensions to existing settlements close to the public transport network and other services. This is the preferred approach.

Dunfermline Strategic Development Area proposal requires the detailed identification of the development areas to be undertaken through the Dunfermline and West Fife Local Plan (DWFLP). Public consultation will be undertaken during this process.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Where would new roads be sited? What would be the impact of another 9,000 cars?

Response:

The Dunfermline and West Fife Local Plan and masterplan for the Dunfermline Strategic Development Area (SDA) will identify the detail of sites and infrastructure required, as listed in Finalised Plan Proposal DC1. The Finalised Structure Plan Action Plan lists required transport and other infrastructure for the SDAs and will be subject to biennial review.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Concerned about potential flooding due to development.

Response:

Detailed issues relating to the potential of land to flood will be evaluated during the preparation of the DWFLP and masterplans. (See Scottish Executive's SPP7 Planning and Flooding on www.scotland.gov.uk) See also Policy SS1 of the Finalised Structure Plan.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Water and Drainage

Comment:

Concerned about the capacity of the sewerage infrastructure.

Response:

Finalised Plan Policies DC1 and C1 seek to ensure that appropriate infrastructure is provided in support of new development.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Water and Drainage

Comment:

Concerned about the impact of failure of old mine workings on water flows.

Response:

Any action necessary to address additional outflows arising from past mining activities will be addressed in consultation with The Coal Authority and the Scottish Environment Protection Agency. See also Policy SS1 of the Finalised Structure Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

Has the provision of health services for the planned increase in population been considered?

Response:

Yes. Fife Council has been in dialogue with NHS Fife who are the providers of health care facilities and services.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

What about school provision? If the Policy is to build homes first, where would the children of these new houses go?

Response:

Fife Council is undertaking a review of the delivery of education services over the whole of Fife as part of the Schools Estate Strategy exercise. This will take account of housing land allocations within the Development Plan. School places will be provided timeously to meet the planned growth in population and location of new school facilities will be the subject of public debate.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Leisure Facilities

Comment:

It is essential that sporting facilities and community recreational facilities are in the Plan at the outset. What provision is there in the Structure Plan?

Response:

The Finalised Structure Plan addresses strategic issues and the provision of land for open space, sport and other community facilities will be considered through the Local Plan process. The preparation of these Plans will be the subject of widespread public consultation. Other recreational needs cannot be met by the public sector, however, in such cases, the Local Plan could reserve land for other uses to be developed by the private sector.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

It would be a great pity if the views of Dunfermline from the Limekilns Road area were ruined with mass housing. If the Plan is successful, house building should be done in such a way not to destroy the beauty and history of the City.

Response:

The Finalised Structure Plan seeks to establish the principal that all new development will be planned in detail via Local Plans, masterplans and site development briefs to prevent damaging views to and from the historic town centre of Dunfermline.

Action:

Hodkinson, P. - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Dunfermline

Comment:

Concerned about possible development to west of Dunfermline and about access to the countryside, wildlife and views to and from Dunfermline Abbey.

Response:

The boundaries and sites of the Dunfermline Strategic Development Area will be identified through the Dunfermline and West Fife Local Plan. This process will take full account of nature conservation and landscape issues including the views to and from Dunfermline Abbey. Fife Council is committed to identifying a Green Belt on the western edge of Dunfermline, which will be delineated as part of the preparation of the Local Plan and will take account of these matters. Work is ongoing to prepare Core Paths Plan which will ensure continued and enhanced access to the areas beyond any new development.

Action:

Duthie, E - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Leisure Facilities

Comment:

Concerned about possibility of the development of McKane Park.

Response:

McKane Park is allocated for Open Space in the Adopted Dunfermline and the Coast Local Plan. The Dunfermline Strategic Development Area option is being pursued and the future of McKane Park and the area to the west will be considered during the preparation of the Dunfermline and West Fife Local Plan. The issue of recreational and open space requirements is important and will be fully addressed as part of the preparation of the Dunfermline and West Fife Local Plan. The Structure Plan is not site specific.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Dunfermline

Comment:

Concerned about the possible lack of services in proposed Dunfermline expansion, particularly sports facilities.

Response:

Finalised Plan Policies DC1 and C1 seek to ensure that appropriate infrastructure is provided in support of new development. Policy SDA1 outlines provision of community facilities and other services which will be required for Strategic Development Areas. The Area Local Plan and masterplan will provide further details of specific proposals.

Action:

Gold, lain - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Concerned about lack of statistical back up to justify housing needs. Population is declining and there are unoccupied Council houses.

Response:

Concerns noted. The Finalised Structure Plan identifies a housing requirement of 13,000 houses for Dunfermline Housing Market Area over the period 2006-2026. However, land for 4,850 houses has already been identified, leaving a shortfall of 5,380 houses. Of this shortfall, 8,150 houses would be in the Strategic Development Area to the south west/west/north of Dunfermline.

Fife Council is required to ensure that land for housing is brought forward via Structure and Local Plans. Fife Council's strategy is to concentrate new greenfield land release in a small number of planned extensions to existing settlements close to the public transport network and other services.

The detailed identification of the Dunfermline Strategic Development Area will be progressed through the Dunfermline and West Fife Local Plan (DWFLP). Public consultation will be undertaken during this process.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Infrastructure

Comment:

Plan does not cover infrastructure matters.

Response:

Fife Council will work with their partner organisations and service providers to ensure all necessary new services and facilities would be brought forward when required. Finalised Plan paragraphs 3.6 - 3.10 and Action Plan provide information about the infrastructure.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Leisure Facilities

Comment:

Concerned about proposals to develop McKane Park for housing. This should be retained as a Green Area.

Response:

McKane Park is allocated for Open Space in the Adopted Dunfermline and the Coast Local Plan. The Dunfermline Strategic Development Area option is being pursued and the future of McKane Park and the area to the west will be considered during the preparation of the Dunfermline and West Fife Local Plan. The issue of recreational and open space requirements is important and will be fully addressed as part of the preparation of the Dunfermline and West Fife Local Plan. The Structure Plan is not site specific.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

No infrastructure, poor access and congestion on the Forth Road Bridge will affect property sales.

Response:

The Finalised Structure Plan sets out the way ahead for addressing the problems of the Forth crossing capacity. Other ongoing developments such as the Ferry Toll park and ride scheme and improved rail services are designed to increase the capacity of the public transport system.

On the contrary to your suggestion, Fife has many positive factors making it an attractive proposition for people moving into the area and this is reflected in the pace of development in the Dunfermline Expansion Area.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

What is meant by the term "Affordable Housing"?

Response:

The definition used by Fife Council in the Finalised Structure Plan Glossary is the same as that used by the Scottish Executive in national planning guidance. It is defined as "Housing of a reasonable quality that is affordable to people on modest incomes. In some places the market can provide some or all of the affordable housing that is needed, but in other places it is necessary to make housing available at a cost below market value to meet an identified need". In terms of low cost housing for sale, which is but one means of delivering affordable housing, affordability will be determined by house prices and average household incomes which vary across Fife. The updated Housing Needs and Affordability Study is being used to determine target house prices. These are set out in the Implementation Guide on Affordable Housing.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Concerned that affordable housing will be the slums of the future.

Response:

Fife Council will ensure that affordable housing will be built to high standards of design and construction quality and will be fully integrated into new developments. The concern that affordable housing will be the new slums is not supported. Fife Council is also promoting good quality design through the Urban Design Guide.

Action:

No Change

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Developer Contributions

Comment:

How can Fife Council justify seeking affordable housing and other developer funded service provision?

Response:

The funding of affordable housing and other facilities should be reflected in the price developers pay for the land rather than the sale price of the houses to be developed as suggested in Scottish Executive guidance e.g. PAN 74.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Concerned that Dunfermline Town Centre is in decline and Plan does nothing to address this. Parking on New Row should be banned.

Response:

The Finalised Structure Plan contains numerous references to Dunfermline city centre, which it identifies as being a key, sub regional centre. In particular Policies S1 and S2 make specific reference to Dunfermline in order to enhance its role. The issue of parking on New Row is not a strategic land use planning issue.

Action:

No Change

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

The Plan does not provide statistical back up on business development issues. Concerned about the impact of 4,500 new houses in Dunfermline on health facilities and education provision.

Response:

The information sought is contained in the Report of Survey. It is intended that the necessary infrastructure and services such as health care and education facilities will be in place timeously to serve new development.

Action:

No Change

Comment No: 10

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Is Fife not one of the cheapest areas in the country?

Response:

House prices in Fife vary considerably. In Elie for example the average house was £244,000 in 2004 (Source: House sales in Fife 2004). However, affordability is not simply related to house prices it is also dependent on household incomes. Housing is a particular issue for those on modest incomes.

Action:

Robertson, Derek - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Concerned about potential traffic problems, in the Limekilns Road Area if new housing is built.

Response:

Development Services will be working in association with Transportation Services and other roads agencies to ensure suitable road network in support of any new development. This would be part of the Dunfermline and West Fife Local Plan and masterplanning exercises.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Concerned about the possible impact of new development on the proposed flood prevention scheme.

Response:

The potential of land to flood would be taken into account in the detailed delineation of any areas to be developed via DWFLP preparation process and the preparation of any masterplans. See also Policy SS1 of the Finalised Structure Plan.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Leisure Facilities

Comment:

Concerned about the possible impact of the development on sports facilities, and Green Areas in the McKane Park area.

Response:

McKane Park is allocated for Open Space in the Adopted Dunfermline and the Coast Local Plan. The Dunfermline Strategic Development Area option is being pursued and the future of McKane Park and the area to the west will be considered during the preparation of the Dunfermline and West Fife Local Plan. The issue of recreational and open space requirements is important and will be fully addressed as part of the preparation of the Dunfermline and West Fife Local Plan. The Structure Plan is not site specific.

Action:

McLean, Robin - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Dunfermline

Comment:

Objects to further housing on west side of Dunfermline with particular reference to area near McKane Park and concerned about scale of proposed housing development.

Response:

Concerns about the number of houses proposed to be built in the Dunfermline area are noted. The Finalised Structure Plan identifies a housing need for the Dunfermline and West Fife Area over the period 2006 to 2026 as 9,200 houses. However land for 3,820 houses has already been identified and this leaves a shortfall of 5,380 houses. Of this shortfall 4,550 houses would be in the Strategic Development Area to the south west/west/north of Dunfermline.

Fife Council is required to ensure land for housing brought forward via Structure and Local Plans. Fife Council's strategy is to concentrate new greenfield land release in a small number of planned extensions to existing settlements close to the public transport network and other services. This is the preferred approach.

Dunfermline Strategic Development Area proposal requires the detailed identification of the development areas to be undertaken through the Dunfermline and West Fife Local Plan (DWFLP). Public consultation will be undertaken during this process.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Dunfermline

Comment:

Objects to further housing on west side of Dunfermline with particular reference to area near McKane Park and concerned about scale of proposed housing development.

Response:

Concerns about the number of houses proposed to be built in the Dunfermline area are noted. The Finalised Structure Plan identifies a housing need for the Dunfermline and West Fife Area over the period 2006 to 2026 as 9,200 houses. However land for 3,820 houses has already been identified and this leaves a shortfall of 5,380 houses. Of this shortfall 4,550 houses would be in the Strategic Development Area to the south west/west/north of Dunfermline.

Fife Council is required to ensure land for housing brought forward via Structure and Local Plans. Fife Council's strategy is to concentrate new greenfield land release in a small number of planned extensions to existing settlements close to the public transport network and other services. This is the preferred approach.

Dunfermline Strategic Development Area proposal requires the detailed identification of the development areas to be undertaken through the Dunfermline and West Fife Local Plan (DWFLP). Public consultation will be undertaken during this process.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Concerned about potential effect on flooding of Lyne Burn.

Response:

In preparing the Local Plan and master plans the potential of land to flood would be taken into account in the detailed delineation of any areas to be developed via DWFLP preparation process and the preparation of any masterplans. (See Scottish Executive's SPP7 Planning and Flooding and PAN 69 on www.scotland.gov.uk) See also Policy SS1 of the Finalised Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Dunfermline

Comment:

Concerned about potential effect on flooding of Lyne Burn if new housing is built.

Response:

The potential of land to flood would be taken into account in the detailed delineation of any areas to be developed via Dunfermline and West Fife Local Plan preparation process and the preparation of any masterplans. (See Scottish Executive's SPP7 Planning and Flooding and PAN 69 on www.scotland.gov.uk).

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

Concerned about the affect of building in the area around McKane Park on views from Dunfermline Abbey.

Response:

Landscape and associated countryside matters, including views to and from the historic core of Dunfermline, will be fully considered in delineating the boundary of the proposed Green Belt for Dunfermline in the process of preparing the draft Dunfermline and West Fife Local Plan.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Dunfermline

Comment:

Concerned about the affect of building in the area around McKane Park on views from Dunfermline Abbey. Has consideration been given to preservation of this historic site?

Response:

Landscape and associated countryside matters, including views to and from the historic core of Dunfermline, would be fully considered in delineating the boundary of the proposed Green Belt for Dunfermline in the process of preparing the draft Dunfermline and West Fife Local Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Concerned about capacities of existing road network, especially Forth Street.

Response:

Development Services will be working in association with Transportation Services and other roads agencies to ensure suitable road network in support of any new development. This would be part of the Dunfermline and West Fife Local Plan and masterplanning exercises.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

Seeks details of provision for increased dental and medical facilities.

Response:

Fife Council is working with healthcare providers to determine their level of service provision for new development. Where necessary land for new facilities will be identified in the masterplans.

Action:

No Change

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Leisure Facilities

Comment:

McKane Park should be set aside for community and sporting use.

Response:

McKane Park is allocated for Open Space in the Adopted Dunfermline and the Coast Local Plan. The Dunfermline Strategic Development Area option is being pursued and the future of McKane Park and the area to the west will be considered during the preparation of the Dunfermline and West Fife Local Plan. The issue of recreational and open space requirements is important and will be fully addressed as part of the preparation of the Dunfermline and West Fife Local Plan. The Structure Plan is not site specific.

Action:

Whitehead, Marilyn - Leven

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Suggests that land in Areas of Great Landscape Value (AGLV) be excluded from Areas of Search.

Response:

The delineation of detailed Areas of Search will be undertaken as part of further studies prior to the finalisation of the Area Local Plans. Landscape issues will be taken into account but may not necessarily include automatic exclusion from all Fife AGLVs. The future of the AGLV designation is under review. The Scottish Executive has asked Scottish Natural Heritage to undertake a consultation on the future of local landscape designations and a decision on the way ahead is awaited.

Neither the Finalised Structure Plan nor Local Plan Core Policies base any policy guidance on AGLV status. Landscape factors, including AGLV and any other new landscape designations which may emerge, will be taken into account in delineating Areas of Search and will be key factors in evaluating all renewable energy proposals.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Considers there is an opportunity for communities to get involved in small turbine projects.

Response:

Agreed. The Finalised Structure Plan and Area Local Plan framework provide positive guidance on the planning issues and potential developers would be welcome to discuss proposals.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

In view of experience on continent suggests potential for Methil/Kirkcaldy harbours.

Response:

The broad area of search currently includes the developed coast, which includes Methil/Kirkcaldy harbours.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Renewable Energy

Comment:

Suggests Fife Council should insist that all new housing developments have renewable technologies built in (e.g. solar panels, geothermal).

Response:

The Finalised Structure Plan and Area Local Plan framework is supportive of the use of renewable energy technologies, including domestic applications. Current planning legislation does not allow Local Authorities to make domestic renewables mandatory.

Action:

Fotheringham, Jacquie - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Concerned about development in Dunfermline Green Belt. Some housing may be required but this should be scaled back.

Response:

Approved Fife Structure Plan 2002 (FSP) policy makes a commitment to designating the Dunfermline Green Belt as does Finalised Structure Plan Policy ENV1. The delineation of the Dunfermline Green Belt will be drawn, taking account of a number of factors via the Dunfermline and West Fife Local Plan. (DWFLP).

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Dunfermline

Comment:

Concerned about growth of Dunfermline over last 10+ years and the problems this has generated

Response: Noted.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Dunfermline

Comment:

Concerned about scale of housing development and expected influx of commuters from Edinburgh.

Response:

Most of new housing allocated to Mid Fife. Concerns about the number of houses proposed to be built in the Dunfermline area are noted. The Finalised Structure Plan identifies a housing need for the Dunfermline and West Fife Area over the period 2006 to 2026 as 9,200 houses. However land for 3,820 houses has already been identified and this leaves a shortfall of 5,380 houses. Of this shortfall 4,550 houses would be in the Strategic Development Area to the south west/west/north of Dunfermline. Fife Council is required to ensure land for housing brought forward via Structure and Local Plans. Fife Council's strategy is to concentrate new greenfield land release in a small number of planned extensions to existing settlements close to the public transport network and other services. This is the preferred approach. If, following the consultation exercise, Fife Council decides to pursue the Dunfermline Strategic Development Area proposal, the detailed identification of the development areas would be undertaken through the Dunfermline and West Fife Local Plan (DWFLP). Public consultation will be undertaken during this process. adversely affected.

Fife Council is required to ensure land for housing brought forward via Structure and Local Plans. Fife Council's strategy is to concentrate new greenfield land release in a small number of planned extensions to existing settlements close to the public transport network and other services. This is the preferred approach.

Dunfermline Strategic Development Area proposal requires the detailed identification of the development areas to be undertaken through the Dunfermline and West Fife Local Plan (DWFLP). Public consultation will be undertaken during this process. adversely affected.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: SDA - Dunfermline

Comment:

Local wildlife should be protected.

Response:

Development Plan fully addresses nature conservation issues.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Document

Comment:

There should be more detailed information on areas for major new development. Their location is not specified.

Response:

The Structure Plan sets out the strategic land releases by identifying their general location. The Area Local Plans set out the detailed policies and specific development sites.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Countryside Access

Comment:

Concerned that new development will prevent access to countryside.

Response:

New development should not restrict access to the countryside. The Finalised Structure Plan (Policy ENV6) makes it clear Fife Council will implement access provisions of new legislation to provide a defined network of paths and this will be fully addressed in any masterplans.

Action:

Policy ENV8 of the Consultative Draft Plan is now Finalised Plan Policy ENV6.

Watt, Maureen - Lochgelly

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Plans should address identified needs including details on type, tenant support services and housing upgrades.

Response:

This is not a strategic planning issue, but is addressed by Fife Council Housing Service.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

Concerned that those in rented property have limited opportunities to move to find work.

Response:

The provision of affordable housing should assist in addressing this concern.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Economy

Comment:

A range of opportunities should be created to help people into work e.g. training opportunities. Those not in work should do community work.

Response:

The detailed issues raised are outwith the scope of the development planning system however Fife Council in conjunction with other agencies, is actively seeking to help people into work via a number of initiatives including training schemes.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Miscellaneous

Comment:

Cleanliness of public spaces is becoming worse.

Response:

Comments have been passed to Environmental Services.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Public Transport

Comment:

Concerned about level and cost of bus services and suggests improvements. Concerned about condition of road and excessive use of speed humps and signs. Concerned about access to schools in Lochgelly.

Response:

Comments have been passed to Transportation Services.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Leisure Facilities

Comment:

Concerned about quality of community facilities. The Lochgelly Centre is good but needs some refurbishment.

Response:

This is not a strategic land use planning issue. However, comments have been passed to Community Services.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Developers could provide better shops in Lochgelly and Ballingry.

Response:

The Finalised Structure Plan supports improving town centres and the quality of retail provision. Proposed new housing development in the area will help to drive town centre improvements. (Para 2.4) Reference to smaller centres is also contained in paragraph 3.32.

Action:

No change.

Pay, Gordon - Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Sustainability

Comment:

Concerned that Fife Matters does not contain commitment to shaping a more sustainable Fife and omits Policy SP1 (2002 Structure Plan). Unacceptable reduction on emphasis on sustainable development.

Response:

Whilst the specific sections and policy have not been carried forward into the Finalised Structure Plan, Chapter 1 and the Vision of Fife in 2026 clearly support sustainability. Policy SP1 related to development proposals and is now contained in Local Plans as Policy S1 to avoid duplication.

Action:

Dickson, Jean - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Concerned about the effects of traffic generated by more housing, increasing visitor numbers and more students.

Response:

Concerns noted. The St Andrews and East Fife Local Plan, Area Transport Plan and masterplanning of the Strategic Development Area will consider transport impacts and identify required infrastructure improvements.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The need for affordable housing is agreed.

Response:

Support noted.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

A rail link should be reinstated. This would contribute to World Class status.

Response:

Proposal PT1 of the Finalised Structure Plan (Draft Plan Proposal PT2) gives commitment to further consideration of transport link options for St Andrews to the rail network, to be addressed through the review of the Local Transport Strategy.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

Does not support proposed site at Largo Road. Suggests St Leonard's Fields as an option.

Response:

The St Andrews & East Fife Local Plan is currently being finalised and will identify a suitable site.

Action:

No Change.

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Landscape

Comment:

A Western expansion would spoil the rural setting of St Andrews. Development should not be allowed too much leeway.

Response:

The development will be controlled through the Local Plan and masterplanning process which will ensure the development does not spoil the setting of St Andrews.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

A new secondary school is needed in the St Andrews/North Fife area.

Response:

Fife Council is aware of the education situation and appropriate Services have been liaising to identify provision required. The Finalised Structure Plan address education needs and identifies methods for delivery where necessary. Fife Council is currently undertaking an assessment of the provision of education services in the future. This will take account of housing land allocations within the Development Plan. Details of the Shaping Future Schools for Fife exercise are available on the Fife web site or from Fife Council Education Service.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Built Environment

Comment:

No more high rise buildings.

Response:

Each proposal for development will be considered on its own merits. A blanket ban on high rise buildings is inappropriate in some locations.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Affordable housing should be affordable in perpetuity.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

No Change

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Supports the application for Pressured Area Status.

Response:

Support noted although this is not a land use planning matter. The Council has applied for Pressured Area Status for a number of areas in Fife.

Action:

Field, Christopher - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Green Belt

Comment:

Strongly urge Fife Council to endorse and defend an effective St Andrews Green Belt as mandated by Scottish Executive in 2002.

Response:

The approved Fife Structure Plan 2002 (FSP) at Policy SS8 does not place the level of restriction suggested in this response. FSP at paragraph 2.1.14 made it clear that "robust defensible boundaries to apply over the Plan period (2001–2011) and beyond will be defined in local plans to reflect a balance between containment and urban growth." In addition, Paragraph 2.1.15 states Local Plans' definition of Green Belt boundaries, including any village envelopes, may reflect existing and planned urban boundaries where further urban development would be acceptable."

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Building 1800 houses would hugely damaging. Town's attractiveness to developers means that expansion needs to be strictly controlled to avoid intolerable strains on facilities and infrastructure.

Response:

Concerns noted. It is proposed that new development will be strictly controlled through Local Plan and masterplanning processes. Facilities and infrastructure provision would be planned to meet needs. Housing allocation reduced from 1,000 to 1,800 to 1,200 houses in Finalised Plan.

Action:

Housing allocation reduced from 1,000 to 1,800 to 1,200 houses in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

There is a need for affordable housing but it should remain affordable.

Response:

Support in principle noted. Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Consider University of St Andrews has a responsibility to provide accommodation that adequately keeps pace with academic expansion.

Response:

This is not a land use planning issue, however the St Andrews and East Fife Local Plan addresses the detail of housing issues in St Andrews.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Town Centres

Comment:

Positive measures should be taken to encourage the viability of small shops and small businesses in town centre.

Response:

Agree. The Finalised Structure Plan supports such measures.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Fife Matters should include a reference to the requirement for a new Secondary School.

Response:

Fife Council is aware of the education situation and appropriate Services have been liaising to identify provision required. The Finalised Structure Plan address education needs and identifies methods for delivery where necessary. Fife Council is currently undertaking an assessment of the provision of education services in the future. This will take account of housing land allocations within the Development Plan. Details of the Shaping Future Schools for Fife exercise are available on the Fife web site or from Fife Council Education Service.

Action:

Forrester, J W Ewing - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Given falling Scottish population and lower economic growth rates in Scotland where will people come from to grow Fife's population?

Response:

Whilst the population is falling, demand for housing is being created by a growth in the number of households thereby providing housing for in-migration in to Fife and will lead to an increase in population.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

If more large scale housing needed, why not concentrate in more industrial west Fife where jobs are more likely to be created?

Response:

The strategy of the Finalised Structure Plan to create employment throughout Fife rather than in west Fife which would reinforce the status quo.

Action:

GVA Grimley, per Strawsons Property, McCafferty, Andrew - Edinburgh

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

There must be a justification based on need for the percentage requirements set out. The document does not provide this. The use of the expression "equivalent of 25% of site capacity" implies that there is no justification for the 25% figure in Mid Fife. The policy is imprecise; the "equivalent contribution in lieu of 25% spelled out. The approach is contrary to the advice contained in Circular 12/1996 and the definition of what is meant by "equivalent" should be set out in the document. The alleged mismatch between need and house type is not spelled out and this should be done in order to test justification for the Policy. There is insufficient detail/analysis/explanation about affordable housing needs in Mid Fife.

Response.

A new Housing Needs and Affordability Assessment has been undertaken and this identified a need for just under 1,000 new affordable houses in Mid Fife. Draft Plan Policy H5 (Finalised Plan Policy H4) has been updated to take account of this, the publication of PAN 74 and the public consultation. The expression referred to has been deleted to reflect this change.

Action:

Change percentage requirement for Mid Fife.

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

With regard to the proposed Strategic Development Areas the need for affordable housing has to be demonstrated and the proposition and type of new affordable housing set out clearly in the development Plan. Strawsons property is prepared to agree that 15% of the Lochgelly Strategic Development Area should be affordable.

Response:

Based on the results of the updated Housing Needs and Affordability Study, percentage requirements have been amended. This is set out in detail in the Report of Survey, and in the Supplementary Guidance on Affordable Housing. The percentage requirement for the Lochgelly area has also been reviewed.

Action:

Change percentage requirements.

Grounds, B J - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Fife Council should be independent of thought and not be held to ransom by developers in their search to provide "affordable housing". There is another way. Please reject the draft and think again.

Response:

It is considered that the approach to affordable housing taken by the Finalised Structure Plan is robust and appropriate. It is consistent with Scottish Executive Planning Policy (SPP3 and PAN 74).

Action:

Hipwell, Mary - Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

If prices are too high, the planners should release more land for housing until the price drops.

Response:

The Finalised Structure Plan identifies an appropriate amount of land for new housing, based on guidance set out in SPP3 and PAN38. The housing land requirement is based on an assessment of housing need, demographic change and other factors as set out in the Report of Survey. The release of more land will not result in a drop in house prices.

Action:

Vivarium, Patullo, Anne - Falkland, Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The Fife Structure Plan should include specific reference to Co Housing as a housing/lifestyle option.

Response:

The Structure Plan is a strategic planning document and such a detailed reference would be inappropriate. The Plan does not preclude the provision of such housing however.

Action:

Logan, Gordon - Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Whilst additional housing are accepted the mathematics does not add up and the locations do not consider the location of jobs and work. North East Fife is rural and a village type atmosphere, structure and to off load the number of houses proposed in this area is considered to be ill thought out - unless another agenda is valid of which we have no knowledge

Response:

The Structure Plan identifies the overall housing land requirement. The St Andrews and East Fife Local Plan identifies development sites to meet this requirement.

Action:

R&G Homes, Young, Gordon - Kirknewton

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The percentage requirements in Draft Plan Policy H5 show a lack of understanding of development costs on small-medium sites. These would have an adverse effect on development, which would become unviable.

Response:

Percentage requirements have been revised in the light of the new Housing Needs and Affordability Study and PAN 74. They are consistent with the advice contained in PAN 74. Draft Plan Policy H5 now Finalised Plan Policy H4.

Action:

Revise percentage requirements in Finalised Plan Policy H4.

Hopper, L D R - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Strongly object to the number and complexity of documents which were issued for public consultation requiring any views to be expressed within an eight week time frame. These documents must be the culmination of many man years of work yet individual members of the public have given a very short time scale - which included Easter holidays and the May bank holiday period - to read, digest and make reason comment.

Response:

Concerns noted. Each document provided information about its purpose however comments re inter-relations help of documents will be given further consideration. The documents were in the public domain from late November 2004 onwards. The public consultation period was in excess of the statutory requirement and this was further extended to take account of comments submitted well beyond the closing date. The comments form was intended to assist consultees ensure comments were made in relation to the appropriate plan.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

In view of the conclusions of the 1998 St Andrews Strategic Study that St Andrews is at its landscape capacity and no major expansion should take place and the quality of the town's environment is under threat from traffic congestion together with the approved 2002 Fife Structure Plan which states no new housing is required in St Andrews until 2011, it is not clear what has changed since then.

Response:

The 1998 Study was to inform the replacement for the 1994 Structure Plan which was approved in 2002. Significant changes have taken place which require the provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

What has led to the assumption that in spite of the fact that the population of Scotland is declining that the forecast for Fife is to increase the population and in St Andrews in particular? Is it because St Andrews has been identified as the economic driver for Fife through the golf industry and the university? If this is the case, why should this lead to an increase in the population of St Andrews by 30% over the next twenty years. An increase in golf tourism does not need any increase in local housing of an executive type. This type of house will be occupied by commuters (increasing traffic density in the town). In addition the forecast increase in university graduates is minimal over the plan period and likewise does not justify the proposed increase in housing planned.

Response:

In December 2005 the GRO (General Register Office for Scotland) issued new population projections. The projection is for Fife's population to grow by 9.1% to the period 2024. The consultative draft Structure Plan was based on 5% growth over the 20-year period to 2026. The Council still considers that 5% growth, as opposed to the new projection of 9.1% growth, is realistic and achievable.

The 2004 based population projections continue to show a long-term decline nationally. However at a sub-regional level the buoyant Edinburgh economy is resulting in population growth across East Central Scotland. Net levels of inward migration are high as people are drawn or retained by the number of jobs available.

A section on demographics is contained within the Finalised Report of Survey accompanying the Structure Plan, which provides further technical detail and justification for planning for 5% growth.

Councils such as West Lothian, East Lothian and Stirling are all projected by the GRO (General Register Office for Scotland) to have population growth over 9% in the period up to 2018.

Fife is now coming under the influence of the Edinburgh City Region. Between 2000 and 2004 the population of Fife has grown by over 6,000. This level of growth easily meets the 5% aspirational population target set for Fife over a twenty year period. Recently published 2004 based population projections show Fife growing by 9.1% over the next twenty years.

Action:

Demographics work has been updated, the details of which are contained in the Report of Survey.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

While there is a need for affordable housing why not plan to build such houses only on sites already designated for building?

Response:

The scale of the affordable housing shortage in Fife is such that is not practical (4,958 new units required). In any event it is not possible to amend planning permission retrospectively. Many sites already have planning permission.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

There is need for a clear definition of affordable housing.

Response:

The definition of affordable housing used in the Finalised Structure Plan and Supplementary Guidance is consistent which that contained in SPP3 and PAN 74. In terms of low cost housing for sale, which is but one means of delivering affordable housing, affordability will be determined by house prices and average household incomes which vary across Fife. The updated Housing Needs and Affordability Study is being used to determine target house prices. These are set out in the Implementation Guide on Affordable Housing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Any increase in the size of St Andrews will destroy the landscape setting, lead to traffic gridlock and no doubt result in future drainage problems in the North Haugh and Kinnessburn area. The result will be to detract from the very reasons for choosing St Andrews as the economic driver for Fife.

Response:

The landscape issues have been fully considered as part of the process of delineating the St Andrews Green Belt boundary. Policy ENV1 has been reviewed to take account of representations made and the emerging Government guidance in the consultation draft of SPP21 Green Belts. Green Belt will be identified at St Andrews and Dunfermline to preserve the character of the towns, the setting and critical views to and from their historic cores, to prevent urban coalescence and to control long term growth. There will be a presumption against new development except for specified exemptions. The policy will be taken forward through Local Plans which also identify the boundaries. Significant changes have taken place which require provision of land for new development for the period to 2026 and the emerging Development Plan is addressing these requirements. It is considered that the planned development of St Andrews will prevent the environmental damage suggested.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 07

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Any affordable housing needs to be managed though as its truly affordable in perpetuity and not able to be resold in the market at unaffordable prices.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

Smith, Dorothy - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Need to be assured that the provision of any new homes in and around St Andrews reflects the real needs of the community. Need affordable housing particularly for those on lower incomes who wish to live and work in their home town, but surely there is no need for a large number of expensive new houses. It should therefore avoid developer led schemes to provide affordable housing.

Response:

Fife Council's approach to delivering affordable housing through the planning system is based upon the updated Fife Housing needs and Affordability Study, which shows a need for just under 1,500 new affordable homes in the St Andrews Housing Market Area. This is the most comprehensive study of its kind ever conducted in Fife. The provision of affordable housing through the planning system is a legitimate means of contributing to meeting the need for affordable housing. This is supported by the Scottish Executive's planning policy. Many local authorities throughout Britain are already using this approach.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Affordable housing must mean affordable in perpetuity.

Response:

Agree that retention of affordable housing is a very important issue. This is easiest to achieve with social rented stock. Fife Council is seeking to suspend the right-to-buy with regard to its own housing in a number of areas including the St Andrews area. Where the tenure is low cost home ownership the council will use legal mechanisms and/or Section 75 Agreements. This has and is being actively pursued and is addressed in both the Finalised Structure Plan and Supplementary Guidance on Affordable Housing.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Money to provide affordable housing could be available from various sources such as Communities Scotland, the Scottish Executive or by obtaining pressured area status for St Andrews.

Response:

Fife already benefits from Communities Scotland investment in affordable housing and this will continue. In addition the Council has also submitted an application for Pressured Area Status for the St Andrews area and indeed other pressured areas in Fife.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Affordable housing should only be allocated to those who fulfil certain criteria e.g. native to St Andrews, priority occupation etc.

Response:

This is not strictly a land use planning matter. However, the Implementation Guide on Affordable Housing, published by the Council's Housing Service, sets out the priority client groups. It is important that priority client groups are identified.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Houses in Multiple Occupancy

Comment:

In recent times in St Andrews there has been a considerable increase in the exploitation of town centre property as multiple occupancy accommodation for students. This must have reduced the stock of affordable housing for towns people and it is to be hoped that Fife Council may be able to monitor this development and contain, if possible further development.

Response:

Noted. It is acknowledged that this is an important local issue. However, as the Structure Plan is a strategic document, this matter is more properly addressed by the Local Plan process especially the St Andrews and East Fife Local Plan. However the issue of management of such properties is not a land use planning matter.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

The schemes involving housing associations or council owned homes should be explored.

Response:

The Council's preference is for social rented housing. However, the scale of provision will be determined by Communities Scotland funding, largely through housing associations, which will inevitably be less than that required to address the shortfall in entirety. Fife Council has applied for Pressured Area Status (suspension of the right-to-buy) for those parts of Fife with the most acute shortfalls.

Action:

Nimmo, Irene - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: MSHA - St Andrews

Comment:

Given that there is a decreasing Scottish population, why does Fife Council consider it necessary to provide 35,000 new homes? In relation to St Andrews in particular recent years 2002 the Approved Structure Plan indicated there was no need for any new housing in the area until 2011.

Response:

The reasons for the proposed growth in the population are set out in Chapter 1 of the Finalised Structure Plan. Plans must be updated to take account of changing circumstances and there have been significant changes since the approval of the Structure Plan 2002.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

If the proposed level of housing for St Andrews goes ahead, this will impact greatly on traffic, health facilities, drainage, and schools. In addition the centre of St Andrews is already extremely busy with traffic often at gridlock.

Response:

The proposed scale of development is considered appropriate to meet the projected requirements for the period to 2026. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing, and to facilitate a new link road for the town. The delineation of development areas in the draft Area Local Plan has taken full account of the landscape and other service issues. It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

The schools in St Andrews are stretched to capacity and Fife Matter fails to address the need for another secondary school locally.

Response:

Fife Council is aware of the education situation and appropriate Services have been liaising to identify provision required. The Finalised Structure Plan addresses education needs and identifies methods for delivery where necessary. Fife Council is currently undertaking an assessment of the provision of education services in the future. This will take account of housing land allocations within the Development Plan. Details of the Shaping Future Schools for Fife exercise are available at www.fifedirect.org.uk or from Fife Council Education Service.

Action:

No Change

Comment No: 04

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Affordable housing is necessary within the St Andrews area, but the building of 1800+ new homes to clear a St Andrews waiting list of approximately 400 seems excessive.

Response:

The Report of Survey sets out the detail of the housing land requirement and allocations, with the scale of development proposed for St Andrews appropriate to meet local needs and an element of growth over the period 2006-2026. St Andrews is identified in the Finalised Structure Plan as a Strategic Development Area. A further 1,200 new houses are proposed at St Andrews over the next 20 years. The St Andrews and East Fife Local Plan will identify specific sites to meet this need taking account of the proposed Green Belt boundaries. This allocation of 1,200 new houses is a reduction from the consultative draft Structure Plan which identified between 1,000 and 1,800 houses over the same period. This change has been made in response to the comments received on the consultative draft Plan balanced with the need to provide additional housing supply in St Andrews, including affordable housing and to facilitate a new link road for the town.

Action:

Housing allocation reduced from 1,000-1,800 to 1,200 in Finalised Plan.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Consultation

Comment:

Consider that the number of documents that one was expected to read over such a short period is excessive. Consider that Fife Council is obviously trying to discourage residents from making comments by bombarding them with four documents at the one time.

Response:

Each document provided information about its purpose however comments re inter-relations help of documents will be given further consideration. The documents were in the public domain from late November 2004 onwards. The public consultation period was in excess of the statutory requirement and this was further extended to take account of comments submitted well beyond the closing date. The comments form was intended to assist consultees ensure comments were made in relation to the appropriate plan.

Action:

Hirst, L - St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Providing affordable housing in the St Andrews area is a supportable aim which is achievable without intrusion into greenfield sites.

Response:

The scale of the identified need for affordable housing in the St Andrews Housing Market Area is such that it cannot be met from brownfield sites alone. It amounts to just under 1,500 units. However the Council's priority is to use brownfield sites first wherever possible.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Land Requirement

Comment:

Providing unaffordable or market value housing opens the door to second home buyers (in some cases multi-owners) to rent out to students and avoid council tax. Fife Council would gain more from occupants who pay council tax for amenities provided.

Response:

Noted. Fife Council as planning authority is obliged to provide a 5-year supply of housing land at all times to meet identified needs. The calculation of the housing land requirement is set out in the Report of Survey. Council tax is not a Structure Plan issue.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Houses in Multiple Occupancy

Comment:

The University of St Andrews has enough land and property to provide multiple occupancy, without occupying any more of the houses in the towns which could be used to house citizens of Fife and provide more income for Fife Council.

Response:

The University cannot be required to provide student accommodation. However the Council is liaising with the University. It is acknowledged that housing in multiple occupancy is an important local issue. However as the Structure Plan is a strategic document, this matter is more appropriately addressed by the Local Plan process, especially the St Andrews and East Fife Local Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

There should be a ceiling on housing to be sold to anyone other than locals as they do in the Channel Island of Jersey, thus providing housing which is affordable to locals in the area.

Response:

This is not a land use planning issue. However, the issue of priority client groups is addressed in the Implementation Guide on Affordable Housing. Households with a local connection are afforded priority but not exclusively so. Provision must also be made for other groups including incoming workers.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Infrastructure

Comment:

Excessive building in the St Andrews area will also put a strain on sewage and flooding.

Response:

Concerns noted. Any development in the St Andrews area would be subject to the requirements of Policy SS1, which requires that water and drainage infrastructure is or can be made available. Policy SS1 also requires full account is taken of flooding issues.

Action:

Sangster, William - Strathkinness, St Andrews

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

St Andrews is a finely balanced place of business, university, tourism and residence. To tinker with this is going to upset the balance and may destroy what has made St Andrews different over the centuries.

Response:

It is intended that the changes will be planned in order to ensure that St Andrews is not adversely affected by new development.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Accurate information as to the population of St Andrews which clearly identifies the split between resident and the student population is required prior to planning for the town until 2026.

Response:

The information is included in the revised Report of Survey.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

Present infrastructure at St Andrews would never cope with a fact of the development that is proposed in particular reference to medical and dental needs, education needs, traffic and other issues.

Response:

It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Houses in Multiple Occupancy

Comment:

It is considered that two-thirds of the student accommodation is now located in St Andrews central ward. At this present rate it is predicted that in ten years time there will be no actual full time residents or families living in St Andrews central ward. St Andrews central ward is like a ghost town at present.

Response:

Presumably this concern relates to houses in multiple occupancy. It is acknowledged that this is an important local issue. However as the Structure Plan is a strategic document, this matter is more appropriately addressed by the Local Plan process, especially the St Andrews and East Fife Local Plan. The Finalised Structure Plan aims to reinvigorate town centres, including St Andrews by encouraging a diverse range of uses (Policy S1).

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

Bassaguard Industrial Site in St Andrews requires to be approved and developed on a long term basis to support the small diminishing independent tradesmen businesses in St Andrews. St Andrews needs tradesmen to sustain the amount of housing repairs from a central site which is currently close to homes of those using the property which reduces commuting. In addition local tradesmen provide an opportunity for local youth to gain apprenticeships.

Response:

This issue is site specific and as such is more appropriately addressed by the St Andrews and East Fife Local Plan.

Action:

Kilmany and Logie Community Council, McNeely, T - Balmerino, Newport on Tay

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Housing Density

Comment:

While need to use land efficiently, housing developments should include elements of the natural environment such as trees and open space. Given a surplus of agricultural land, suggests increasing the area available for new housing so that lower densities can be achieved, creating more attractive developments.

Response:

Local Plan Core Policies provide detailed guidance relating to open space and natural environment in relation to housing developments. Agricultural land is a finite resource which must be managed sustainably. The density of development outlined in Draft Plan Policy H8 (now Finalised Plan Policy H6) is that required to encourage sustainable use of land, increase public transport usage and give scope for careful open space consideration.

Action:

Changes have been made to the Finalised Plan Policy H6 in response to the wider comments raising concern in respect of the consultative draft policy.

Burgh of St Monans Community Council, Whitome, Ben - St Monans, Anstruther

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

People need jobs to enable them to remain in the East Neuk. With the demise of the fishing industry it is vital alternative employment is made available. It is suggested that whilst a great deal has been dome to encourage yachts into the area little has been done to encourage the development of supporting businesses. Is this an area Scottish Enterprise Fife could assist with?

Response:

Fife Council and a number of other agencies such as Scottish Enterprise Fife have the potential to provide various types of assistance.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Public Transport

Comment:

It is considered that improved public transport is required in the East Neuk to enable people to get to their work at times employers expect them to be there and to be able to return home at night after late shifts.

Response:

Comment noted.

Action:

The East Neuk of Fife Preservation Society, Beaton, John - Elie,

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Boundary Changes

Comment:

Do not agree with the decision to move Largo area from the East Fife area to Central Fife. It is considered that Largo is very much part of the traditional rural and fishing heritage of East Neuk and that it should be part of the East Fife area.

Response:

Concern noted. The change to Local Plan boundaries was approved by Fife Council in 2004.

Action:

NHS Fife, Adamson, Cathy - Kirkcaldy

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Ambitious plan to increase Fife's population by over 20,000 over 20 years is broadly welcomed by NHS Fife, as a major contribution to Fife's' economic sustainability and thus to the overall health and wellbeing of the population.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

It is crucial that NHS staff who provide Primary Care and Community Health Services are involved in discussions with planners and developers on major proposed new housing developments. Three developing Community Health Partnerships (Dunfermline & West Fife; Glenrothes and NE Fife; Kirkcaldy & Levenmouth) will be the main focus of NHS Fife involvement in early planning discussions.

Response:

Contact details will be passed to appropriate Area Plan teams. NHS Fife is aware of the proposals for growing Fife's population 2006-26.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

An increase in housing provision does not always automatically mean a consequent increase in populations in that local area, but only an increase in households. However, sometimes there is a genuine increase, e.g. the Dunfermline Eastern Expansion (DEX), and NHS Fife would wish to learn lessons from the DEX experience with Council colleagues as NHS Fife consider the development intended for the Strategic Development

Areas.

Response:

Fife Council will work in consultation with NHS Fife on the detailed masterplanning of the Strategic Development Areas drawing upon the experience of the DEX area.

Action:

Requirement for Healthcare facilities taken into account in Policy DC1 and Proposal DC1.

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

As well as economic sustainability and prosperity, housing and the environment play key roles in promoting health and wellbeing. NHS Fife therefore supports the Plan's emphasis on affordable housing.

Response:

Support noted.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Public Transport

Comment:

As well as economic sustainability and prosperity, housing and the environment play key roles in promoting health and wellbeing. NHS Fife therefore supports the Plan's emphasis on improved transport.

Response:

Support noted.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

Policy C3 is not understood and appears to be very constrictive compared with that in the existing Structure Plan. It is considered that primary health care facilities require to be located either within or near to communities they serve, wherever these may be. Suggest that Policy C3 should be worded "Proposals for new, expanded or augmented health care facilities will be supported where they are in sustainable locations, supported by public transport."

Response:

The Policy is applicable to all heath care facilities and the first two bullet points address the requirements expressed by NHS Fife with regard to the provision of facilities. The third bullet point seeks to ensure that any surplus (or redundant) heath care facilities are re-used for a purpose that is appropriate to their location. The policy could provide more clarity and the wording should be amended.

Action:

Draft Plan Policy C3 has been deleted and is incorporated in Policy C1 of the Finalised Plan.

West Villages Community Forum Crane John - Saline Dunfermline

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Strategy

Comment:

West Villages Community Forum supports the re-development of the Comrie Colliery site as proposed by the site owners and their representatives. The support is given in the knowledge that all subsequent planning applications made by the developer will be scrutinized by the appropriate authorities to ensure that: -

- a. All contaminated ground is adequately and safely cleared; and,
- b. The adjacent SSSI is adequately protected and preserved.

Response:

Support for the proposed redevelopment of the Comrie Colliery site subject to the reservations that all subsequent planning applications made by the developer will be scrutinized by the appropriate authorities to ensure that: -

- 1. All contaminated ground is adequately and safely cleared; and,
- 2. The adjacent SSSI is adequately protected and preserved, is noted.

Action:

Scottish Water - - Glasgow

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Water and Drainage

Comment:

The overall context of the Draft Structure Plan, as far as water and wastewater are concerned, reflects the approach Scottish Water has sought to secure with various Councils during the past few years.

Response:

Support noted.

Action:

No Change

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Water and Drainage

Comment:

It is noted that the Settlement Strategy which will focus on six large scale Strategic Development Areas for mixed use, a number of settlements for medium scale growth and the development of brownfield sites prior to the development of greenfield sites is likely to target areas where Scottish Water has the greatest ability to readily meet demand.

Response:

Support noted.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Water and Drainage

Comment:

It is noted that the Plan considers a large increase in the number houses to be constructed with an anticipated overall increase in the population to 2026 of 20,000 with a further growth in population by 30,000 in the year 2046. It is also noted that the location of these developments and the employment opportunities that the Plan proposes are mainly centred on the six strategic development areas. At present Scottish Water have adequate capacity at the wastewater treatment works to cope with the increase but the location of the sites and the ability of the infrastructure to cope with regards to flooding and discharges to water course will have to be considered through the Drainage Impact Assessment process and the Local Plan.

Response:

Anticipated ability to service proposed development noted

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Water and Drainage

Comment:

The supply of raw water to treatment works has always been a problem in some areas of Fife. However, the developments have been considered on a site by site basis and Scottish Water is unaware of any constraints which have stopped development proceeding. At present (November 2005) there is ongoing an leakage and rehabilitation scheme that should be completed in the near future. Within two or three months of this scheme being complete Scottish Water should have enough information to comment on the trend in water supply and have sufficient information on the ability to supply the development areas. If a shortfall exists additional works will be required to provide a raw water supply to your proposed development areas. Newburgh is the only major concern at the present moment with regards to the supply from the treatment works. The works may have to be upgraded to cope with a small increase in population.

Response:

Lack of constraints noted

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Water and Drainage

Comment:

Scottish Water has voiced concerns about brownfield sites which are contaminated through former use and welcome the comments that the Plan recognises the additional costs that have to be borne by developers.

Response:

Welcome noted

Action:

Brett Tim - Cupar

Comment No: 01

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Population Growth

Comment:

Concerned about the scale of development proposed for the Tay Bridgehead area. Fife Council has failed to show that there is a need for development at the level proposed for the Tay Bridgehead area.

Response:

Finalised Structure Plan allocates 500 houses 2006 - 2026 which is a reduction from the 750-950 suggested in the Draft Plan.

Action:

Revise allocation for Tay Bridgehead area in Finalised Plan Proposal H2 to 500 houses.

Comment No: 02

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Infrastructure

Comment:

Whilst new sewerage infrastructure to serve the Tay bridgehead area will be partly rectified by new Tayport/Newport sewage works it is considered the additional capacity will be inadequate to service the scale of development proposed.

Response:

Fife Council will work with their partner organisations and service providers to ensure all necessary new services and facilities would be brought forward when required. Finalised Plan paragraphs 3.6 - 3.10 and Action Plan provide information about the infrastructure.

Action:

No Change

Comment No: 03

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Concerns about the impact extra housing in the Tay Bridgehead area will have on road structures. Concerned that in Newport and Wormit the major constraint is a single main road running between the two through which most of new traffic would need to pass, if as is likely, people are commuting to Dundee.

Response:

Concerns noted. Development Services will be working in association with Transportation Services and other roads agencies to ensure suitable road network in support of any new development.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Education

Comment:

Wrong to develop plans for additional housing until the School Estates Strategy decides on future location for new secondary school facilities. Concern also about primary school capacity in Newport and Tayport to sustain significant additional capacity. Expect the education capacity problems would be rectified before any significant new housing is built.

Response:

Fife Council is aware of the education situation and appropriate Services have been liaising to identify provision required. The Finalised Structure Plan addresses education needs and identifies methods for delivery where necessary. Fife Council is currently undertaking an assessment of the provision of education services in the future. This will take account of housing land allocations within the Development Plan. Details of the Shaping Future Schools for Fife exercise are available at www.fifedirect.org.uk or from Fife Council Education Service.

Action:

No Change

Comment No: 05

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Health Care

Comment:

Concerned about the capacity of the medical facilities to cope with significant additional population.

Response:

It is intended that the appropriate infrastructure and facilities will be in place at an appropriate time to facilitate development planned. NHS Fife is aware of the proposals for growing Fife's population 2006-26.

Action:

No Change

Comment No: 06

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Support the provision of additional affordable housing in the Tay Bridgehead community as there is a significant shortfall in the area.

Response:

Support noted.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Affordable Housing

Comment:

Need for more sheltered housing for which there are long waiting lists.

Response:

Noted. Requirement for sheltered housing has been quantified by the Housing Needs and Affordability Study and by Fife Council's Housing Service. This will be addressed through the Development Plan and will be reflected in advice from the Council's Housing Service at the time of any relevant application.

Action:

No Change

Comment No: 08

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Recognise there may be need for additional park and ride facilities but concerned site suggested will need to be properly evaluated.

Response:

This is not a strategic planning issue and site details will be full addressed by Transportation Services.

Action:

No Change

Comment No: 09

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Transport Proposals (PT2)

Comment:

Welcome provision of rail halt but unless significant car parking can be provided would doubt if it would be well used. Suggest Old St Fort Station may be a better option that site at Naughton Road.

Response:

This issue should be addressed by Transportation Services via Local Transport Strategy and Local Transport Plan.

Action:

Document: Fife Matters - Fife Structure Plan 2006 - 2026 Consultative Draft

Subject: Employment Land

Comment:

Questions the need to provide employment land. Accepts some small scale development would be valuable but pointless to develop speculative sites which are then unused.

Response:

Provision of new facilities would provide for companies bringing employment opportunities to the area.

Action: